

SRI International

Final Report • July 1992

STUDY OF THE FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM: OPERATIONS, FUNDING, AND COORDINATION

Volume I: Study Findings and Conclusions

Deborah Kogan, SPR, Technical Director
Fiona Kelley, SRI, Policy Analyst
Catherine M. Casserly, SRI, Project Manager
Evelyn Hawkins, SRI, Policy Analyst

Prepared for:

U.S. Department of Agriculture
Food and Nutrition Service
Office of Analysis and Evaluation
3101 Park Center Drive, Room 214
Alexandria, VA 22302

Project conducted by:

SRI International
333 Ravenswood Avenue
Menlo Park, CA 94025

Social Policy Research Associates (SPR)
200 Middlefield Road
Menlo Park, CA 94025

SRI Project No. 1666
USDA Contract No. 53-3198-0-55

This report was prepared for the Food and Nutrition Service, U.S. Department of Agriculture, under Contract No. 53-3198-0-55. Because contractors conducting research and development projects are encouraged to state their findings and express their judgments freely, this report does not necessarily represent the official opinion or policy of the Department of Agriculture. The contractor is solely responsible for the content of this report.

Members of the research team included:

Deborah Kogan, Technical Director
Catherine M. Casserly, Project Manager
Lee Anderson
Evelyn Hawkins
Fiona Kelley
Suzanne Kreutzer
Kevin Rogers
Choya Wilson

FOREWORD

Over the past fifteen years, the Food and Nutrition Service (FNS) sponsored several research projects related to the employment and training needs of Food Stamp Program (FSP) participants. Much of this research looked at the effects of these programs on participants. Less was known about local program implementation. This study was designed to describe local employment and training program operations and examine how Federal policies filter down to the local level and affect program design decisions. We were also interested in the extent to which the Food Stamp Employment and Training Program (E&T) was coordinated with other employment and training programs.

Research conducted in the late 1970's and early 1980's indicated that relatively inexpensive, broad-based programs emphasizing immediate employment for job-ready individuals seemed to work. Given this research and a desire to ensure that those who are able to work *do* work, national E&T policy emphasized immediate employment for individuals with few barriers to employment. To encourage States to serve as many job-ready individuals as possible, FNS required States to serve at least 50 percent of the eligible population each year.

Although the national emphasis prior to Fiscal Year (FY) 1993 was on broad-based programs, this study, conducted during FY 1991, found a great deal of variety in program design. Some programs emphasized only procedural compliance with E&T job search activities, others emphasized job search training, and still others provided more intensive education and vocational training services through non-financial coordination linkages with service providers. The report indicates that the 50-percent participation standard succeeded in encouraging inexpensive, broad-based programs emphasizing immediate employment in most areas. It also indicates that some program managers perceived the standard as a barrier to the more targeted, intensive service programs they preferred. However, even with the 50 percent standard, some program managers were able to provide intensive services by establishing non-financial agreements with local service providers.

Beginning in FY 1993, FNS reduced the 50 percent participation rate standard to 10 percent. This Federal policy has been changed in response to national research findings (sponsored by FNS) from the first year of E&T operation that the program did not increase the employment or earnings of program participants when compared to a randomly-selected control group. Thus, FNS has now given States more flexibility to redesign their E&T programs and target services to individuals with serious barriers to employment. FNS is also currently testing demonstration projects that conform E&T to the Job Opportunities and Basic Skills Training Program (and, in some cases, to the Job Training Partnership Act Program) in an attempt to further refine and improve E&T.

Office of Analysis and Evaluation
Food and Nutrition Service, USDA
December 1992

CONTENTS

Executive Summary	ES-1
1 OVERVIEW OF STUDY AND RESEARCH OBJECTIVES	1
Background and History of the Food Stamp E&T Program	1
Study Objectives	3
Conceptual Framework	4
Organization of the Final Report	11
References, Chapter 1	14
2 STUDY DESIGN	15
Overview	15
Sample of States and Local Sites	16
Case Study Method	19
3 VARIATIONS IN LOCAL CONTEXT	27
Variations in Urbanization and Size of County Population	27
Variations in the Local Economy and Labor Markets	30
Variations in the Public Assistance Context	32
Characteristics of Individuals Subject to Food Stamp E&T Requirements	37
Summary	38
4 SERVICES PROVIDED TO E&T PARTICIPANTS	41
Available Service Components	41
Job Search Activities	42
Job Search Training	50
Education and Training	56
Work Experience	67
Supportive Services: Reimbursement of Participant Expenses	71
Summary	74

CONTENTS (Continued)

5	CLIENT FLOW AND PARTICIPATION PATTERNS	79
	Creating a Client Pool for E&T Services	79
	Orientation, Assessment, and Assignment to Services	83
	Case Tracking and Monitoring Procedures	93
	Sanctioning Procedures and Practices	95
	Closing E&T Cases	98
	Participation Patterns	98
	Summary	101
6	E&T PROGRAM DESIGN DECISIONS	105
	State Versus Local Roles in E&T Program Design	105
	Funding Decisions	109
	State and Local Perspectives on E&T Goals and Objectives	113
	Client Targeting Decisions	118
	Service Design Decisions	123
	Service Delivery Arrangements	130
	Decisions About Consolidating E&T with Other Work Programs	134
	Emphasis on Coordination with Local Employment and Training Programs	139
	Summary of E&T Design Options	144
	Factors Influencing E&T Program Design Decisions	147
7	PROGRAM REPORTING AND ACCOUNTABILITY	155
	Data Collection Practices and Management Information Systems	155
	Influences of Participation Rate Performance Standard	159
	Capacity to Implement Outcome-Based Standards	161
	Summary	162
8	CONCLUSIONS AND RECOMMENDATIONS	165
	Current Features of the E&T Program	165
	The Changing Policy Context	166
	Building on Current Practices	167
	Recommendations for Strengthening Employability Development Goals	169

EXHIBITS

1. Conceptual Framework	6
-----------------------------------	---

TABLES

2-1. Local Sites by Variables Used in Sample Stratification	20
2-2. Comprehensive Case Study Data Collection Topics	22
3-1. Features of the Local Context	28
4-1. Features of Job Search Components	44
4-2. Features of Job Search Training	51
4-3. Features of Education and Vocational Training Components	57
4-4. Features of Work Experience Components	68
4-5. Availability of Supportive Services	72
5-1. E&T Participation Patterns	100
6-1. State Contributions to Food Stamp E&T Operating Costs - FY 91	111
6-2. State Level of Expenditures for Reimbursement of Participant Costs - FY 91	114
6-3. Use of Categorical and Individual Exemptions by the Study States	119
6-4. Service Frequency	124
6-5. Summary of Key Variations in E&T Service Designs	128

Preface

The research team members wish to express our appreciation to the staff at the participating state and local Food Stamp agencies for their cooperation with the field research for this study. We also appreciate the assistance of our Project Officer at the Food and Nutrition Service--Barbara Fay Murphy--and the cooperation of Ellen Henigan, Supervisor of the Work Programs Section of the Food Stamp Program at FNS.

GLOSSARY

ABE:	Adult Basic Education
AFDC:	Aid to Families with Dependent Children
CBO:	Community-Based Organization
CWEP:	Community Work Experience Program
DOL:	Department of Labor
E&T:	Food Stamp Employment and Training Program
EDP:	Employability Development Plan
ES:	Employment Service
ESL:	English as a Second Language
FNS:	Food and Nutrition Service
FSA:	Food Stamp Agency
FSP:	Food Stamp Program
FY:	Fiscal Year
GA:	General Assistance
GED:	General Educational Development (Certification)
JOBS:	Job Opportunities and Basic Skills Training
JTPA:	Job Training Partnership Act
NOAA:	Notice of Adverse Action
NPA:	Non-Public Assistance
OJT:	On-the-Job Training
UI:	Unemployment Insurance

Note: In this report we depart somewhat from FNS usage, which, for the purpose of computing state performance on the federal participation rate standard, refers to "E&T placements" as the sum of placements into E&T service components and notices of adverse action (NOAAs) issued. We refer to "E&T service placements" as reported placements in service components, *excluding* NOAAs, and describe NOAAs as a separate phenomenon.

EXECUTIVE SUMMARY

STUDY OBJECTIVES

The Food Stamp program has always emphasized the responsibility of Food Stamp recipients to register for work and accept available employment. Since the implementation of the Food Stamp Employment and Training (E&T) Program in 1987, states have been required to provide one or more of the following employment and training services to work registrants: job search, job search training, workfare, work experience, job training, and educational services. The goal of these E&T services is to increase the employability of program participants.

The goal of this study was to describe how local Food Stamp E&T programs are organized, designed, and operated. The study focused on what factors influenced state and local policymakers in their program design decisions and how these decisions affected:

- The clients targeted for participation in E&T services.
- The range of services provided.
- How clients are matched to and sequenced through particular services.
- How the administration of the Food Stamp E&T program is integrated with the operation of other work programs for public assistance recipients.
- The extent to which E&T services are coordinated with other employment and training services and funding streams available in the local community.

The research effort examined how different factors influenced the ability of local Food Stamp E&T programs to address the employability barriers faced by program participants. Conclusions and recommendations of the study suggest how federal, state, and local program administrators might

amend E&T policies, procedures, and services to further employability development objectives and improve employment outcomes for program participants.

RESEARCH METHODOLOGY

Sample Selection

Case studies of 15 representative but diverse local E&T programs were conducted to examine how different factors influence the Food Stamp Employment and Training Program's operation at the local level. It was essential that the sites selected be typical yet reflect the national variation in policy, operational, and economic contexts. Stratified random sampling provided variation on the context within which the local Food Stamp E&T programs operate and on the broad features of the E&T service designs selected at the state or local level. A two-stage sample selection process was used to take advantage of the distinction between variables measured at the state and local levels, with probability of selection proportional to program size at each stage.

State-level stratifying variables included:

- Whether the Food Stamp E&T program was state or locally administered.
- Whether the state offered an ongoing General Assistance (GA) program for employable individuals at the state level or in the most populous county.
- Whether the state plan for Food Stamp E&T services placed a high, medium, or low emphasis on job search or job search training components.

In addition, sample variation on several additional state-level factors was maintained through postselection review. These variables included the level of state fiscal E&T support, the percentage of all mandatory work registrants given exemptions from E&T participation, the percentage of all placements that were voluntary, and geographic region.

One local site was selected from each sample state, using two county-level stratification variables:

- Whether the local site had high, medium, or low unemployment.
- Whether the local site was characterized by high, medium, or low urbanization.

Variations in the Final Sample

The sample resulting from this stratified selection procedure consisted of 6 county-administered and 9 state-administered E&T programs, including 7 sites with ongoing GA benefits for employable individuals and 8 sites without. Eight sample counties were highly urbanized, 4 were of medium urbanicity, and 3 were largely rural in character. Four sample sites had unemployment rates at or below 5%. Another 4 sample sites had moderate unemployment rates--between 5% and 8%. Seven sample sites had unemployment rates in excess of 8% during FY 91, which reduced the likelihood that Food Stamp E&T participants would find work.

Sites also varied as follows:

- The proportion of the county population receiving Food Stamps in the sample sites ranged from 2% to 21%.
- AFDC/SSI recipients ranged from 26% to 90% of the Food Stamp recipient caseloads in the sample sites.
- Sites varied in how E&T participants were perceived:
 - In 7 sites, E&T participants were characterized as generally job ready.
 - Five of the sample sites emphasized the serious employment barriers facing many Food Stamp E&T participants, including homelessness, mental disabilities, and long-term patterns of dependency.
 - The remaining 3 sites emphasized that the E&T work registrant pool was not homogeneous but included both less-job-ready and more-job-ready individuals.

Case Study Methods

Site visits to each of the sample sites lasted 4 to 8 days and included reviews of existing documents and discussions with state-level program administrators, local administrators, E&T program operations staff, service providers, and representatives of other local employment and training services. Observations of ongoing E&T services were integrated into the site visit schedule. In addition, 5 to 10 randomly selected client files were reviewed at each local site to document how clients were assessed and matched to services, how program participation and outcomes were documented, and how typical clients were sequenced through the available services over time.

Within-site analysis included the preparation of a comprehensive site narrative summarizing the details of the E&T program design and operation in each of the study sites. Cross-site analysis included the development of descriptive typologies to compare and contrast different client targeting, program design, and coordination strategies used by program managers to further E&T program goals under varying local conditions.

CONTENT OF E&T SERVICES

Job Search

All sites offered one or more job search components. In 7 sites, the largest job search component was operated in-house by local welfare agency staff. Of the remaining 8 sites, 4 contracted with the Employment Service for the administration of job search, 1 contracted with the local JTPA agency, and 3 contracted with other local agencies.

Study sites used two different approaches to the design of job search components:

- Eleven of the sites operated job search components that emphasized procedural requirements for completing a prescribed number of employer contacts to maintain Food Stamp eligibility.

- Four sites emphasized effective job search methods with a goal of actually securing employment. Each of these sites provided substantial guidance during the job search phase or targeted job search services to job-ready clients.

Job Search Training

Some form of preemployment training, job readiness training, or job search training was available to E&T participants in 10 of the 15 study sites. Two sites operated job search training directly, within the welfare agency. The remaining sites contracted with other organizations for the provision of job search training.

- Five sites emphasized the provision of job search training to all E&T participants, as the first E&T service component for most participants.
- In the remaining 5 sites that offered this service, job search training was targeted to specific subgroups or those who failed to locate employment after an initial job search.

In 3 sites, job search training was narrowly focused on the mechanics of job search (e.g., developing job leads, making employer contacts, preparing resumes, completing job applications, and conducting job interviews). In 7 sites, job search training workshops covered a wider range of topics, including career exploration, labor market information, life skills, and skills related to successful job performance.

Education and Training

Education and/or vocational training activities were included in the E&T service plans in 13 of the 15 sample sites. However, in 10 sites, education and training services accounted for less than 10% of all service placements. In most sites, education and training services were provided through referral to local programs available to the general public; services were not designed specifically for E&T participants.

- All 13 sites used nonfinancial coordination linkages to enable E&T participants to gain access to education and training services available in the local community.

- Two sites also used E&T program funds to purchase training for some E&T clients. In several instances, these services were designed specifically for public assistance recipients. These
-
-
-

sites provided education and training services to a substantial proportion of all E&T participants.

Educational services available through the E&T program usually included adult basic education, GED preparation, and English as a second language instruction. Vocational training services most often consisted of referrals to the local JTPA system.

Work Experience

Unpaid community work experience (CWEP) was an E&T service component in 6 study sites. One of these sites also offered paid work experience through the Food Stamp E&T program as a 100% state-funded component for Food Stamp work registrants who also received local General Assistance benefits.

Placements into E&T work experience components accounted for only a small percentage of all E&T service placements, ranging from 1% to 8%. Use of work experience components appears to be declining, at least partly in response to an increasing state-level emphasis on education for Food Stamp E&T work registrants.

The content of work experience assignments varied in its value for improving client employability: job assignments ranged from unskilled menial tasks to general office help to training in specific occupational skills in demand in the local labor market.

Reimbursement of Participant Expenses

Twelve of the 15 study sites offered up to \$160 per month per child for reimbursement of dependent care costs for participants in E&T services. In 2

All 15 sites reimbursed E&T participants for transportation expenses. Five sites explicitly included other costs incurred by participants (e.g., tuition, books, work clothes, tools) in the supportive services allowances provided to E&T participants. In 13 of the 15 study sites, participant reimbursements for transportation and other costs did not exceed \$25 per month. In the remaining 2 sites, costs in excess of \$25 per month were paid out of 100% state funds.

Transportation allowances were paid using two different methods. Nine sites limited reimbursements for transportation and other costs to documented or estimated actual costs. In the remaining 6 sites, transportation allowances were paid as fixed allowances, either at the beginning of participation in a component or at the completion of each month of participation.

CLIENT FLOW AND PARTICIPATION PATTERNS

Work Registration and Referral to E&T Services

Work registration occurred during the Food Stamp application or recertification interview with the Food Stamp intake/eligibility worker at all 15 study sites. However, individual exemptions were determined by intake/income maintenance workers at only 8 sites. In 7 sites, individual E&T exemptions were determined after referral to the E&T program. States varied in the number of exemption criteria used, and sites varied in how individual exemption criteria were interpreted. Most sites that granted an individual exemption did so for the full 12-month Food Stamp certification period, but several sites monitored the status of exempted individuals every 60 days. Three sites granted temporary deferrals if participation was feasible within 30 days.

After determining mandatory work registration status, eligibility workers referred individuals to E&T service units or service contractors. Twelve sites informed E&T service providers about referrals by sending automated or hard-copy reports. Three sites expedited enrollment by hand-delivering referral forms to the E&T program staff.

Orientation, Assessment, and Assignment to Services

In most sites, orientation, assessment, and service planning were not considered separate E&T service components but were part of E&T intake and enrollment.

Attendance at an orientation session was the first required program activity in most sites and typically occurred 1 to 4 weeks after referral to the E&T program. Group orientations were provided in sites with large numbers of E&T participants and/or standardized service sequencing. Individual orientation sessions were used by some sites with individualized service planning; other sites used a combination of group and individual intake sessions to reduce costs. Not all sites provided a separate orientation: if an E&T program had only a single service component or a fixed sequence of services, the initial intake session was often combined with the start-up of the first service component.

Formal assessments were not widely used to document participants' employability and determine appropriate service assignments. Only 3 sites conducted formal assessments of basic skills and occupational aptitudes for all E&T participants. Six additional sites provided formal assessments to participants assigned to specific service components. Sites with formal assessment procedures tended to provide more substantial job search assistance, job search training, or education and vocational training services. Sites that did not assess participant status tended to emphasize procedural compliance with requirements for self-directed job search.

Service assignment procedures followed three different patterns:

- Four of the 15 study sites developed individualized service assignments for E&T participants.
- Seven sites placed the majority of participants into job search or job search training as their initial E&T service assignment, but allowed participants to select education or training as the first activity if they so desired.

- Four sites had a standardized service sequence, which required completion of an individual job search before assignment to another component. In two of the sites, education or vocational training was available for participants who requested these services, but only after the completion of job search.

Sites with individualized service assignment procedures were more likely to emphasize the use of education and vocational training services. They also designed job search training components that were oriented to less-job-ready clients. Sites with standardized service planning procedures tended to emphasize immediate job placement even if many E&T participants had substantial barriers to employment.

Client Tracking and Noncompliance Procedures

Client progress was tracked primarily to report service placements and monitor compliance with E&T participation requirements. Client tracking was relatively straightforward when services were operated directly by the E&T program unit. Where E&T services were provided by another agency, participant tracking was more problematic. The degree of client tracking varied greatly:

- In some sites, case tracking procedures were extensive for participants in E&T services operated in-house or through financial contracts as well as for participants in services provided through nonfinancial referrals to outside providers.
- In other sites, clients were not tracked beyond referral and enrollment once a referral was made to an outside service provider. This was particularly true for services provided through nonfinancial linkages. Initial service placements were documented, but it was difficult to verify whether the participant attended and completed the component.

For noncompliance with E&T participation requirements, E&T workers notified Food Stamp eligibility workers, who were responsible for issuing notices of adverse action and initiating sanctions. As required by federal regulations, all study sites allowed E&T clients to cure sanctions during the 2-month period of disqualification by indicating a willingness to comply with

program requirements and commencing a required activity. The requirements to cure a sanction were rather easy to meet in most sites.

Initial failure to attend E&T orientation/intake sessions was widespread across the study sites, with no-show rates of 35% to 60% in many sites. High rates of noncompliance and frequency of cures caused many E&T staff to spend up to 50% of their time completing the paperwork associated with reporting noncompliance or curing sanctions.

PROGRAM DESIGN DECISIONS

State and Local Roles in E&T Program Design

In the majority of study sites, the decisions that shaped local E&T service designs and operations were made primarily at the state level. In other sites, local agency staff made key decisions or decisions were shared among state and local policymakers.

- In most of the study sites, states played the dominant role in E&T program design.
 - State policymakers were most influential in determining the content and service delivery arrangements for E&T services funded directly from the E&T budget. Even in some county-administered systems, states exercised strong design control by developing detailed E&T program plans and budgets.
 - Local policymakers usually were responsible for developing nonfinancial referral linkages to existing local programs for the delivery of education and vocational training services.
- State policymakers were particularly influential in the design and sequencing of E&T services in 9 of the 15 sites. Six of these sites were state administered and 3 were locally administered.
- In 6 sites, the local agency staff also had substantial design influence on the services provided with E&T program funds. Three of these sites were state administered and 3 were locally administered.

In the sites with local design discretion, local decision-makers influenced the content of individual services, the sequencing of services, and/or the procedures for assigning participants to specific services. The sites in which local policymakers played a strong design role more often addressed the service needs of participants with barriers to employment.

Funding Decisions

State legislators and administrators also determined how much state funding to contribute to E&T program operations beyond the 100% federal formula funds.

- Four study states did not contribute any state dollars to the operating costs of the E&T program.
- Seven study states contributed a moderate level of state funds, increasing the total program funds by 10% to 90% over the formula funding level after the federal match.
- Four study states contributed a significant level of state funds, increasing the total program funds by 160% to 650% over the formula funding level after the federal match.

States that contributed substantially to the cost of E&T operations spent, on average, about \$100 more per service placement than did states with moderate fiscal contributions. Study sites in states with substantial fiscal contributions also were more likely to provide individualized service planning and emphasize the use of education and vocational training components for E&T participants. However, the increased intensity of E&T services in these sites depended, in large part, on effective use of nonfinancial coordination linkages rather than on the direct provision or purchase of E&T services.

Only 2 of the study states required local sites to make contributions toward E&T program expenditures. In one case, the county was required to contribute 50% of the nonfederal matched funds; in the other case, the county was required to contribute 20% of the nonfederal matched funds. Both sites were in states in which the E&T program is locally administered.

State and Local Perspectives on E&T Goals and Objectives

State and local perspectives on the goals and objectives of the Food Stamp E&T program constituted another major influence on program design decisions. Most state and local decision-makers perceived multiple goals for the Food Stamp E&T program. Among these were:

- *Fulfilling federal procedural requirements--e.g., operating at least one E&T component, providing the required participant reimbursements, achieving the 50% participation rate performance standard, and issuing notices of adverse action (NOAAs) and implementing sanctions as required for noncompliance.*
- *Promoting immediate employment for job-ready work registrants, to prevent or shorten the duration of their stay on Food Stamps and to satisfy taxpayers that public-assistance cost containment measures were being implemented.*
- *Promoting longer-term employability development for less-job-ready work registrants, to help them overcome employment barriers such as lack of basic skills and formal education credentials, lack of work experience, lack of job-seeking skills, or lack of specific occupational skills.*

Given the limited resources available to the Food Stamp E&T program, most of the study states and local sites emphasized the first and second goals more than the third. Sites promoting immediate employment required all mandatory nonexempt work registrants to participate in a standardized set of E&T services including job search and/or job search training focused narrowly on job search techniques. These sites tended to have moderate levels of state fiscal contribution to the E&T program budget and low average expenditures per E&T service placement.

A smaller number of sites decided to emphasize all three goals. Sites that had the goal of improving participant employability targeted a smaller subset of work registrants for E&T participation, offered individualized service planning, and/or made use of some less intensive and some more intensive services, depending on client needs. These sites tended to have high levels of state fiscal contribution to the E&T program and high average expenditures per E&T service placement.

Client Targeting

Three different mechanisms were used in the study states to target E&T services: categorical exemptions, individual exemptions, and selective targeting within the nonexempt work registrant population.

- Planned categorical exemptions ranged from 0% to 65% of all work registrants in the study states. Categorical exemptions narrowed the client base by excluding counties with limited job opportunities, thus reserving program funds for geographic areas perceived to have the greatest potential for improving employment outcomes.
- Planned individual exemptions in the study states ranged from 0% to 24% of all work registrants. Individual exemptions eliminated work registrants whose circumstances made participating in the program impracticable--e.g., lack of transportation or dependent care or physical or mental incapacity. Thus, individual exemptions further targeted the E&T program to work registrants with the greatest labor market availability.
- Only 3 sites applied E&T participation requirements selectively to individuals in the mandatory nonexempt work registrant pool. Selective targeting within the mandatory work registrant pool allowed program operators to select specific groups they thought would be most likely to benefit from services. The targeted groups were varied: some were selected because they had multiple barriers to employment or were receiving substantial public assistance benefits, others because they were motivated to enroll in education or training programs, and still others because they were perceived as more likely to conduct a successful job search.

Sites that emphasized more intensive E&T services and employability development objectives tended to have low rates of categorical and individual exemptions. However, they were more likely to implement selective targeting of clients within the work registrant pool for participation in E&T services. Study sites with selective client targeting all offered GA benefits to employable individuals and attempted to match GA recipients and other less-job-ready clients to the most intensive service components--education, vocational training, or paid work experience.

Encouraging participation by volunteers is a fourth possible client targeting strategy that was not chosen in any of the 15 sample sites.

Although 12 of the 15 sites permitted participation by volunteers, voluntary participants were enrolled infrequently and received only limited services.

Service Design Decisions

Sites placed different emphases on individual job search, job search training, or education and vocational training.

- Seven sites emphasized individual job search as the predominant E&T service. In these sites, job search accounted for more than 85% of all E&T service placements. These sites tended to devote low or moderate levels of state funding to E&T operating costs.
- Five study sites used job search training followed by job search as the predominant services. Low or moderate state fiscal contributions to E&T were also made in these sites.
- Three sites made a significant proportion of all service placements in education or vocational training components. In these sites, placements in education or training ranged from 34% to 57% of all service placements. All three sites contributed substantial state funds to E&T operating costs, although the actual cost of training in these sites was more often provided by nonfinancial coordination linkages than by direct E&T expenditures.
- Work experience was not used very frequently in any of the study sites visited, although it was emphasized in several state plans.

Sites that emphasized job search as the predominant E&T activity were less likely than other sites to use any formal client assessments at intake, and more likely to use standardized service sequences and job search designs that emphasized procedural compliance. At the other end of the continuum, sites that emphasized education and vocational training as the most frequently used E&T service component were more likely than other sites to use individualized service assignment procedures, offer substantial hands-on assistance on how to conduct an effective job search, target less-job-ready individuals for participation in job search training, and orient the content of job search training to those with employment barriers.

Service Delivery Arrangements

Three different overall designs were used for the administration and delivery of E&T services:

- Six sites directly operated all funded E&T activities and services within the local welfare agency. E&T operations were located in a separate work program unit or within another administrative unit. The E&T program in these sites tended to emphasize job search.
- Five sites contracted the operation of the entire E&T program to another agency or organization. Job search or job search training services were usually emphasized in these sites.
- Four sites administered intake, service assignment, and case management of services within the local welfare agency, but contracted with another agency or organization for the operation of some or all service components. This service delivery arrangement was used by most of the sites that emphasized employability development goals and emphasized the provision of education and vocational training services to E&T participants.

Consolidation with Other Public Assistance Work Programs

Consolidation with the JOBS Program for AFDC Recipients

The Job Opportunities and Basic Skills Training (JOBS) program for recipients of Aid to Families with Dependent Children (AFDC) was operational in each of the 15 sample sites. Although consolidation of planning, policy, and administrative oversight of the JOBS and Food Stamp E&T programs occurred at both the state and local levels in a number of the study sites, this practice did not generally lead to consolidation of services or service delivery arrangements for JOBS and Food Stamp E&T participants. Barriers to consolidation included:

- Perceptions that the service needs and employment barriers of the clients of these two programs differed substantially.
- Dramatically different levels of funding available for the provision of services under JOBS and Food Stamp E&T.
- Different regulatory requirements for the two programs, particularly in the areas of required participation rates and sanctioning procedures for noncompliance.

Three sites consolidated E&T service delivery with the JOBS program. This design decision was strongly associated with the following factors: high levels of state fiscal contribution to E&T, individualized service planning, an emphasis on the delivery of educational and vocational training services, an emphasis on effective job search methods rather than mere procedural compliance, the development of strong nonfinancial coordination linkages with local education and training institutions, and the use of selective client targeting within the nonexempt work registrant pool.

Consolidation with Work Programs for GA Recipients

General Assistance (GA) payments were provided to employable individuals in 7 case study sites. Consolidation of GA work programs and the Food Stamp E&T program was selected by 3 states that had made a commitment to invest substantial state funds in E&T programming. By including GA/Food Stamp recipients as Food Stamp E&T participants, these states obtained not only 100% formula funds but also the 50% federal match for services to address some of the employability barriers faced by GA recipients. Each of these sites tried to match GA recipients to the more intensive E&T service components. (They were also the same 3 sites that consolidated E&T/JOBS operations.)

In contrast, in the 4 states with GA programs that offered less intensive Food Stamp E&T services, separate work programs were operated to supplement the available E&T services for GA recipients. Three sites required GA recipients to participate in both the Food Stamp E&T program and a state-administered or locally administered GA work program to gain more control over the GA caseload. One site exempted GA recipients from the Food Stamp E&T program as long as they were actively participating in the state's GA work program.

Coordination with Other Employment and Training Programs

The case study sites generally used E&T budget funds for the operation of job search, job search training, and work experience components, while

using nonfinancial referral linkages with existing community services for the delivery of education and vocational training services to Food Stamp E&T participants.

Financial agreements for the purchase of services for E&T clients ranged from comprehensive contracts to a single organization for the administration of the entire E&T program to specialized contracts with one or more organizations for the operation of a single E&T service component. Financial agreements were used for the operation of job search in 8 sites, for the provision of job search training in 8 sites, and for the delivery of vocational training in 2 sites. Agencies and organizations used as contractors included the Employment Service, local JTPA agencies, and a variety of other public and private organizations.

In addition, nonfinancial coordination linkages with other community resources were used in 13 of the 15 study sites to expand the range of services available to E&T participants.

- Ten sites used the public school system--high schools, adult schools, or community colleges--to enroll E&T participants in adult basic education (ABE), general educational development (GED), or English as a second language (ESL) classes.
- The local Job Training Partnership Act (JTPA) system was used to provide several different types of services to E&T clients, including:
 - Vocational training services in 10 sites.
 - Educational services in 3 sites.
 - Job development/job placement/job search services in 2 sites.
- Two sites used the Employment Service for job placement services.
- Two sites used the local mental health agency for mental health or drug/alcohol counseling.
- Two sites used the local office of the state vocational rehabilitation agency for assessment and the provision of vocational rehabilitation services.
- One site used community-based organizations for literacy training.

Coordination linkages were well developed and accounted for a substantial percentage of service placements in 5 sites. However, in 10 sites, coordination linkages were not widely used. Barriers to the more widespread utilization of existing community resources for E&T clients included:

- *Incomplete information to E&T staff and participants.* Some E&T staff were not well versed on the available training classes and thus did not emphasize the education and vocational training options during E&T orientation sessions.
- *Dependence on client initiative.* Because referrals to education and training were not emphasized at most sites and E&T staff did not directly intervene with the referral agency in most cases, clients had to show substantial initiative to follow up on a referral to an education or training provider and enroll in an available course.
- *JTPA client priorities.* JTPA-funded service providers were often reluctant to enroll large numbers of E&T participants in vocational training because they were seen as too high risk or, alternatively, as not needy enough to qualify for JTPA priority target groups.
- *Lack of case management/tracking procedures.* E&T staff in many sites were unable to provide effective case management services or to track E&T clients participating in education or vocational training programs.
- *Service sequencing.* Local E&T programs often required participation in job search, job search training, or work experience before participation in education or vocational training components.

Summary of Factors Influencing E&T Design Decisions

The two factors with the greatest influence on E&T design decisions were limited program funding and the federal 50% participation rate standard in effect during FY 91. By itself, the low level of E&T funding made it difficult to provide intensive services to E&T participants, unless a site developed particularly strong nonfinancial coordination linkages. Limited funding in combination with the 50% participation rate standard discouraged client targeting and caused many program managers to design relatively "thin" services for large numbers of E&T participants.

and vocational training service delivery, the use of selective client targeting to reach subgroups within the nonexempt work registrant pool, and the consolidation of E&T services with the JOBS program for AFDC recipients.

PROGRAM REPORTING AND ACCOUNTABILITY

The information systems used to maintain data on E&T work registrants and participants were developed to serve important functions in the day-to-day operation of public assistance programs. The ability to generate summary statistics was a secondary consideration. Consequently, management report formats were usually set up to provide only the information called for by the current federal reporting requirements. As a result:

- The capacity to summarize or generate reports on client characteristics and outcomes was limited.
- Automated E&T information systems were generally separate from the eligibility/benefits management information systems. This fact made it more difficult for E&T staff to track client outcomes.

In 9 sites, E&T data were managed at the local site level and reported to the state in hard-copy aggregate-level summary form. In the remaining 6 sites, E&T data were maintained in statewide client-level databases. States with consolidated Food Stamp E&T and JOBS programs sometimes had difficulty producing separate reports on the services received by Food Stamp E&T participants.

Implementation of outcome-based performance standards for the E&T program was initially published for discussion in August 1991. Subsequently, implementation was delayed until one year after (1995-96) the publication of final outcome-based performance standards by the Department of Health and Human Services so that the two systems can be coordinated. The shift from participation rate standards to outcome-based performance standards, currently planned for implementation in FY 94 or FY 95, will require expanded documentation of client outcomes, the ability to maintain an unduplicated count of participation, and the ability to document and adjust for variations

in client characteristics and local labor markets. Relatively few states currently have the capacity to collect, compile, and report the required data items. Development of the capacity to collect and analyze the data necessary for outcome-based standards will require a significant infusion of resources and staff time in most sites.

CONCLUSIONS AND RECOMMENDATIONS

Several recent changes in the federal legislative and regulatory context for the E&T program have emphasized a new interest in encouraging states to serve individuals with substantial barriers to employment and provide more intensive E&T services. These changes include substantial reductions in the federal participation rate performance standard starting in FY 1992, plans to coordinate the design of outcome-based performance standards for E&T and the JOBS program, and announcement of a demonstration program to test conformance of JOBS and E&T regulations in up to 60 local project areas, starting in FY 1993.

While these changes in the Food Stamp E&T policy context have provided individual states with new flexibility, strong national leadership will be necessary to provide a catalyst for changing the orientation of the Food Stamp E&T program on a nationwide basis. Federal leadership could take a variety of forms, including:

- Increasing the funding level for the Food Stamp E&T program as a separate and distinct program.
- Disseminating information about the different E&T program designs currently in use, particularly those designs that offer more intensive services to individuals with significant barriers to employment.
- Supporting national efforts to consolidate and coordinate delivery of services now separately administered by a number of different programs, including JOBS, JTPA, and the Food Stamp E&T program.

Meanwhile, a number of individual states and Food Stamp agencies may be interested in taking advantage of the reduced participation rate performance

standard to redesign E&T services. Based on our study findings, we have identified alternative strategies that state and local administrators could use to further the employability development objectives of the Food Stamp E&T Program. These strategies include:

- Redesigning individual service components to provide meaningful services to E&T participants.
- Implementing selective client targeting rather than universal participation requirements.
- Matching individual clients to appropriate services, including assigning individuals with employment barriers to more intensive services.
- Strengthening service consolidation and service coordination linkages.
- Enhancing data collection and accountability procedures to document the completion of planned services and the achievement of employment outcomes by E&T participants.

Redesigning Individual Service Components

We recommend that state and local administrators interested in redesigning their E&T programs offer participants more substantive assistance in conducting effective job searches rather than merely monitoring individual job search contacts. Not all E&T participants need detailed instruction in job search methods. However, at a relatively low cost, even job-ready clients could be offered access to a review of effective job search techniques (e.g., through brief group sessions). Job clubs and peer support groups are other low-cost organizational structures that could be used to provide ongoing support during job search to individuals needing more intensive services. In addition local E&T programs could refer individual clients to job search services available from the Employment Service, JTPA, and community-based organizations.

Implementing Selective Client Targeting

While not necessarily a desirable goal in itself, selective client targeting is a logical response to the funding constraints of the E&T program. Given funding limitations, selective client targeting enabled some states and local program administrators in the study to design programs that offered more intensive services to smaller numbers of participants, rather than spreading the available funding thinly over as many participants as possible. Thus, we recommend that states interested in redesigning E&T services consider selective client targeting as a strategy to focus limited E&T resources on specific target groups.

Matching Individuals to Appropriate Services

As states and local E&T programs diversify their service offerings, with some services designed for individuals with more serious employment barriers and other services designed to provide substantive job search assistance to more job-ready clients, matching individuals to appropriate services will take on increased importance. Given limited program funding, individual service planning is necessary to conserve the most intensive services for individuals who need these services and can benefit from them.

Strengthening Service Consolidation and Coordination Linkages

We recommend that states interested in developing a wider range of services for E&T participants consider consolidating work programs for public assistance clients, if doing so will increase the funding or range of services available to E&T participants. Even without fully consolidated programs, states and local sites may benefit from the joint operation of individual service components (e.g., job clubs) as consolidated services.

Nonfinancial coordination linkages were perhaps the most important factor that permitted some study sites to expand the range and intensity of services available to E&T clients. We recommend that other states and local programs follow this lead. To make education and vocational training

services more fully integrated options within the E&T service system, we recommend that E&T staff become familiar with the range of programs and services available in their local communities, inform E&T participants about these service options, and develop effective formal coordination agreements with these providers to facilitate the referral and enrollment of E&T clients in their programs.

Enhancing Accountability Procedures

As state administrators and local site managers begin to expand the range and intensity of services provided to E&T participants, they will be increasingly interested in how outcomes vary for different types of participants receiving different services. Additional information about program outcomes will also be necessary to generate the data for outcome-based performance standards. To prepare for outcome-based accountability systems and provide information on service effectiveness, we recommend that states and local sites begin to develop the capacity to document client progress as well as service and employment outcomes.

1 OVERVIEW OF STUDY AND RESEARCH OBJECTIVES

Over the last few decades, the philosophy and orientation of U.S. public assistance programs for those in need have undergone a gradual but nevertheless radical transformation. In addition to providing ongoing financial assistance, public assistance programs are now designed to encourage able-bodied clients to prepare for entry or reentry into productive work as soon as possible.

The Food Stamp Program (FSP) has always emphasized the responsibility of Food Stamp recipients to look for work and accept available employment. Following a series of demonstration projects that tested a variety of work programs for FSP recipients, Congress created the Food Stamp Employment and Training (E&T) Program as part of the Food Security Act of 1985. Implemented in 1987, the E&T Program requires states to design and implement services to emphasize the responsibility of job-ready recipients to find work and to provide employability enhancement services to those with barriers to employment.

This study examined the design and operation of local Food Stamp employment and training programs through detailed case studies of 15 local program sites. The objectives of the study include describing how state and local policymakers have organized and designed the delivery of services to E&T participants, examining how different factors have influenced local program designs and operational procedures, and assessing the impact of service consolidation and coordination linkages on the services provided to program clients.

BACKGROUND AND HISTORY OF THE FOOD STAMP E&T PROGRAM

Food Stamp Program recipients have been required to register for work as a condition of receiving benefits since 1971. Over time, however, changes

have occurred in the specific designs for mandatory work participation and the groups subject to Food Stamp work requirements. Initially, FSP work registration required all registrants to file work registration forms with the Employment Service (ES) system.

Because the initial work registration requirements often turned out to be little more than a formality, states were permitted and encouraged to implement a variety of alternative work registration and work participation procedures between 1977 and 1985. In the 1977 amendments to the Food Stamp Act, states were permitted to implement workfare pilot demonstrations for FSP participants. In 1979, Food Stamp Work Registration and Job Search demonstrations were initiated at the request of the Office of Management and Budget (OMB).

Research findings on the impact of the various pilot and demonstration projects were generally encouraging (Brandeis University et al., 1984; Auspos, 1986). Alternative work programs and participation requirements appeared to hold the potential for modest but significant earnings gains by individual FSP participants and resulted in reductions in FSP benefits. In response to these generally positive findings, Congress mandated in the Food Security Act of 1985 that all states must design and implement a program of employment services for FSP work registrants. States were required to implement a Food Stamp employment and training program by April 1, 1987.

Congress indicated that the primary objective of local Food Stamp employment and training (E&T) programs should be *to increase the employability of program participants*, that is, "[to] assist...members of households participating in the Food Stamp program in gaining skills, training, or experience that will increase their ability to obtain regular employment." States could choose to implement one or more of the following service components in designing E&T programs: job search, job search training, workfare, work experience or training, and education. Although the federal government has emphasized that E&T programs should have a positive effect on participants' employability, the level of federal funding has remained modest, both on an absolute level (a total of \$159 million in

federal funds in FY 90) and on a per capita basis (an average of \$130 per E&T participant).

A recently completed study of the initial implementation of the Food Stamp Employment and Training Program, sponsored by the Food and Nutrition Service, Office of Analysis and Evaluation, and performed by Abt Associates, examined the impact of E&T participation on participants' employment outcomes. Based on a controlled experiment that compared outcomes for E&T participants and nonparticipants in 53 separate local Food Stamp agencies in 23 states, this study found that individuals who participated in local Food Stamp E&T programs during FY 88 failed to achieve any statistically significant improvements in employment outcomes compared with what they would have achieved without program participation (Abt Associates, 1990).

STUDY OBJECTIVES

The Abt Associates study addressed whether the services provided to Food Stamp work registrants resulted in desired employment impacts. However, little information has been collected and analyzed on the actual details of E&T program design and operation, particularly at the local level. Thus, the goal of this study was to describe how local Food Stamp E&T programs are organized, designed, and operated; what influenced state and local decision-makers regarding program design; and how these decisions have affected:

- The clients targeted for participation in E&T services.
- The range of services provided.
- How clients are matched to and sequenced through particular services.
- How the administration of the Food Stamp E&T program is integrated with the operation of other work programs for public assistance recipients.
- The extent to which E&T services are coordinated with other employment and training services and funding streams available in the local community.

By describing and analyzing these organizational, program design, and operational decisions, the research effort focused attention on how different

factors influenced the ability of local Food Stamp E&T programs to address the employability barriers faced by program participants. These findings should assist state and local program administrators responsible for the Food Stamp E&T program by describing how they can make strategic use of E&T funds to improve the employability of E&T participants in a variety of local program environments.

For example, among the various design decisions facing E&T program managers are the following:

- Whether to attempt to serve as many participants as possible with a low-cost service design or whether to provide more intensive services to fewer or more specifically targeted groups.
- How to sequence participants among different service components, and what groups to target for the most intensive services.
- Whether to operate the E&T program as a self-contained program or whether to encourage coordination or consolidation with other employment and training programs to obtain economies of scale, increase the range of services available to E&T participants, and/or leverage other funding sources.

Because of the limited federal funding for the Food Stamp E&T Program, the Food and Nutrition Service is particularly interested in how E&T program managers are responding to the opportunities for coordination with other employment and training programs for similar populations, including the implementation of the new Job Opportunities and Basic Skills Training (JOBS) program for Aid to Families with Dependent Children (AFDC) recipients. A specific objective of the study, therefore, has been to describe the various consolidation and coordination options, the extent to which program coordination is occurring, and the effects of coordination on the ability of the local E&T programs to deliver employability development services.

CONCEPTUAL FRAMEWORK

A conceptual framework has guided the design, data collection, and analysis phases of this study. The framework, presented in Exhibit 1, identifies:

- (1) The major elements of local Food Stamp Agency organization and operation of local E&T programs (on the right side of the exhibit).
- (2) The factors that influence E&T organization and operations, including the federal, state, and local program and policy environment; the local employment and training program context; and local economic conditions and population characteristics (on the left side of the exhibit).
- (3) Hypothesized relationships among these factors.

Factors That Influence Local E&T Organization and Operations

The Federal Policy Environment

The federal policy environment for the E&T program includes the legislative statements about the goals and objectives of the Food Stamp E&T Program, the level of funding available for the program, and program statutory and regulatory requirements that dictate state and local program practices and accountability procedures. Examples of the federal policies and regulations that have been influential in shaping local E&T program designs are the following:

- The limited amount of federal funding for E&T operations (\$75 million annually in 100% federal grants).
- Federal statutory and regulatory exemption criteria and guidelines for reviewing and approving additional state categorical and individual exemptions.
- Federal performance standards in effect from FY 87 through FY 91 that called for states to serve at least 50% of all mandatory nonexempt work registrants.
- The statutory requirement that states offer, at a minimum, one service component.
- Federal guidelines for the minimum level of annual E&T participation by individual participants (24 hours of work-related activities over a 2-month period).

Between FY 87 and FY 91, federal E&T policies tended to encourage the development of state E&T programs that reached a broad range of mandatory

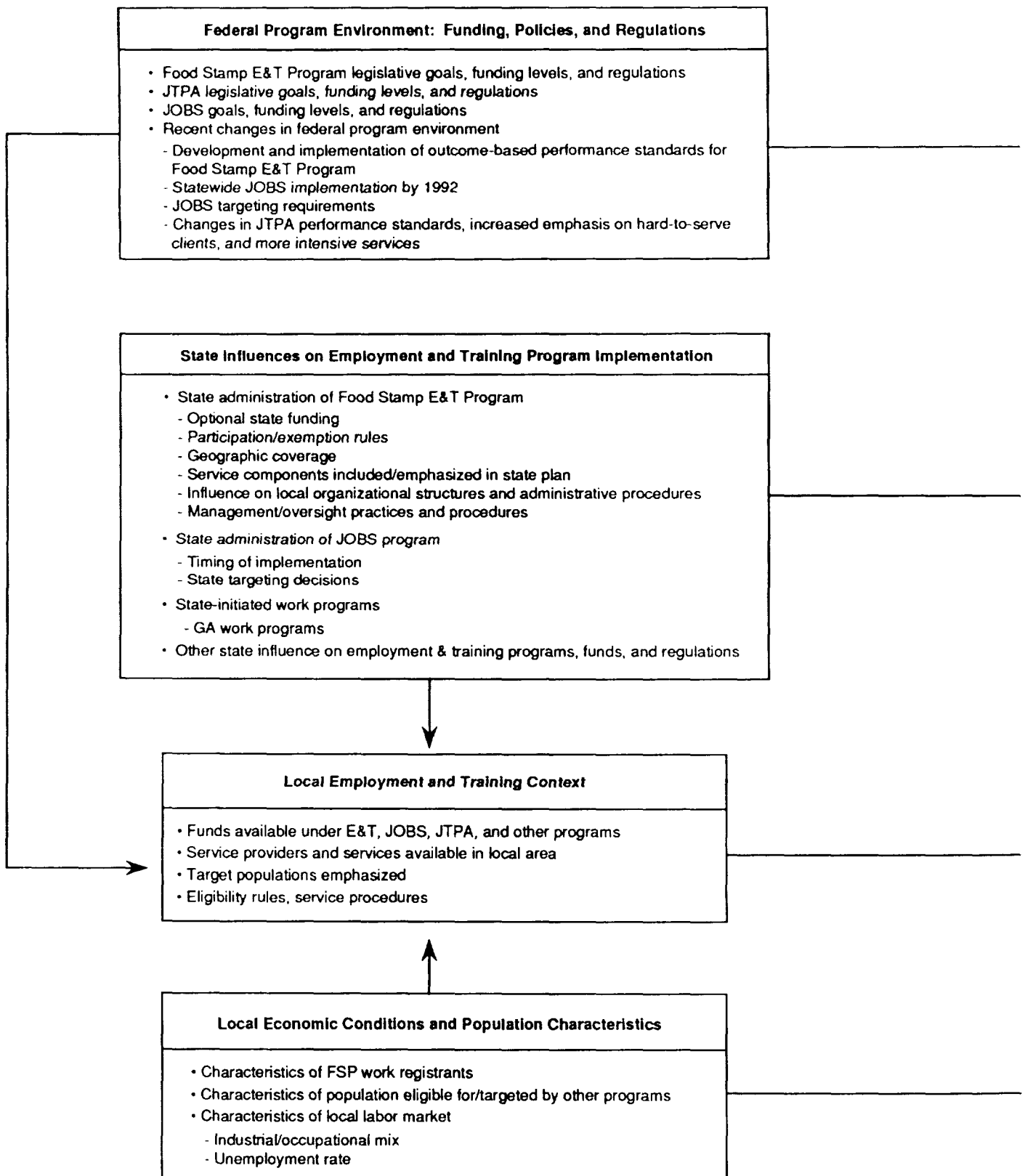


EXHIBIT 1 CONCEPTUAL FRAMEWORK

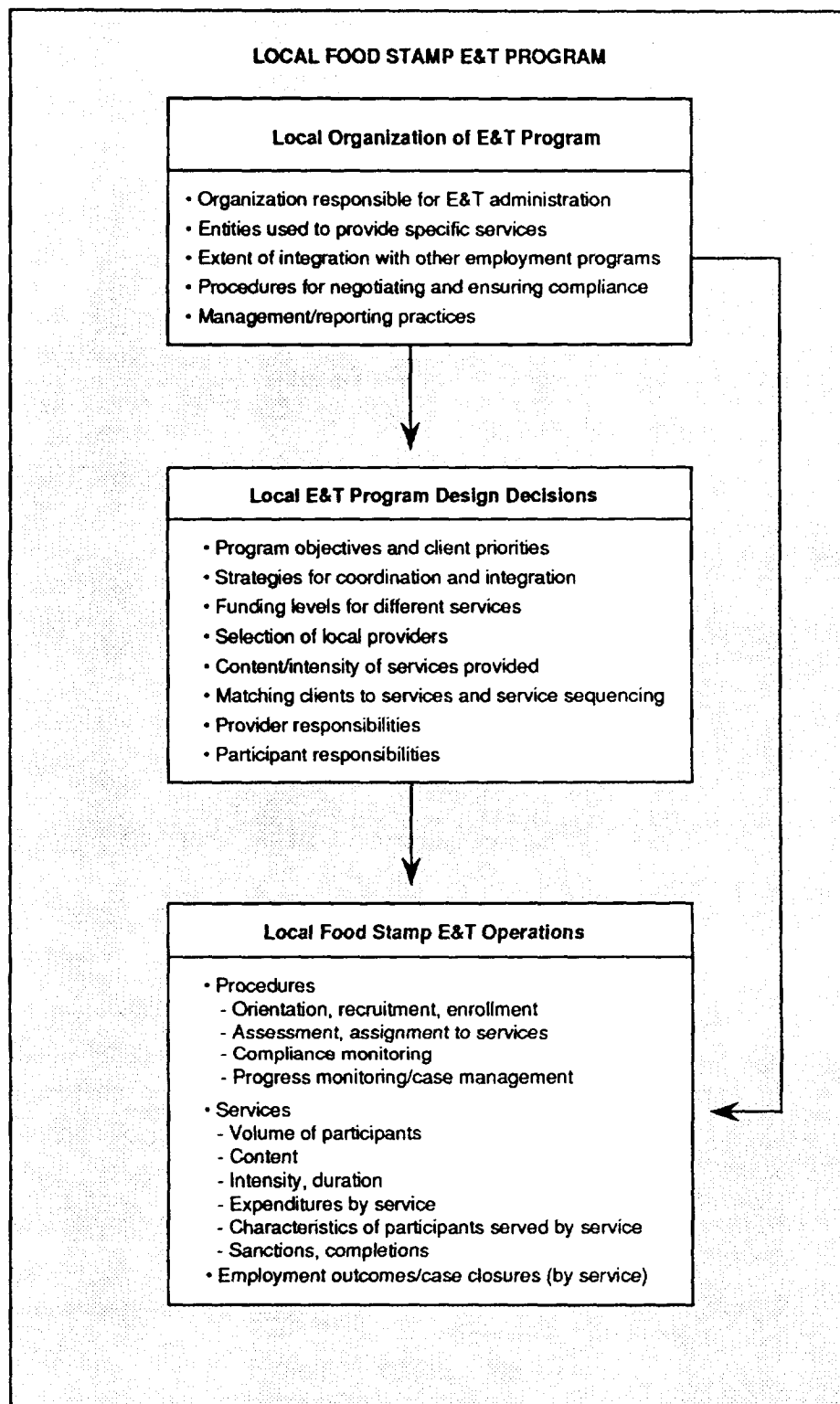


EXHIBIT 1 CONCEPTUAL FRAMEWORK (Concluded)

work registrants with services that involved at least the minimum level of participant effort set forth in the regulations. The federal process for reviewing and approving E&T plans was the primary vehicle for ensuring that state program designs conformed to these federal priorities.

More recently, the federal policy environment for the Food Stamp E&T program has undergone some changes. In conjunction with plans to develop congressionally mandated outcome-based performance standards for the E&T program, federal policymakers have reduced the emphasis on high E&T participation rates and encouraged states to develop more intensive services as well as strategies for targeting specific groups for participation. Specifically:

- The federal performance standard has been reduced from 50% of all mandatory work registrants to 10% of all mandatory work registrants starting in FY 92.
- States have the opportunity to amend their service designs in preparation for the implementation of outcome-based performance standards (which will be developed and implemented in coordination with performance standards for the JOBS work program for AFDC recipients).
- States are being invited to submit applications to conduct demonstrations of E&T/JOBS conformity, which will provide waivers of certain E&T regulations with the objective of promoting consolidation and coordination to increase the intensity of services available to Food Stamp E&T clients.

Federal policies and regulations for other federal employment and training programs, such as the JOBS program for AFDC recipients and the Job Training Partnership Act (JTPA), have also affected local Food Stamp E&T program designs and organizational relationships and have shaped the local service context within which E&T programs are implemented. The required statewide implementation of the JOBS program in all states by 1992 created major changes in the work program environment within which the Food Stamp E&T Program operates at the local level. In addition, proposed changes to the JTPA legislation that would increase the emphasis on serving hard-to-serve clients are causing shifts in the design and client targeting practices of JTPA services in many local areas.

The State Policy Environment

The state policy environment also has been extremely influential in shaping E&T program design decisions. First, state legislators and administrators determine the level of state program funding to supplement the 100% federal formula funds for E&T programming. Second, state policymakers determine the categories of work registrants to exempt from participation requirements within the allowable state options (subject to federal review and approval as part of the state plan review process). Third, state staff determine which E&T service components will be available for local sites to offer to E&T participants. In state-administered systems, state staff may determine what organizational structure will be used to implement the program at local program sites. State administrators may also make decisions about the detailed content and sequencing of E&T services and how to match clients to services, or may defer to local agency discretion on these details of program design and operation.

States also may decide to initiate additional work programs targeted to some of the same individuals covered by FSP work programs, such as General Assistance recipients, refugees, the homeless, or other particular groups.

The Local Program Context

Features of the local context that influence E&T program design and operations include the availability of other local employment and training programs, the funding levels for these other programs, and the history of local cooperation between these programs and public assistance programs. In addition, local economic conditions, such as the industrial and occupational mix in the community, the rate of joblessness, and trends in economic expansion and decline influence the job opportunities open to E&T participants and the appropriateness of different E&T service strategies. Finally, the characteristics of the E&T work registrant population and the extent to which they are job ready influence E&T program designs and the outcomes achieved by E&T participants. Thus, program design decisions that lead to employment

outcomes for participants in one local context may not result in the same outcomes in a different local context.

Organization and Operation of E&T Programs

As shown in Exhibit 1, the study has been organized to distinguish three aspects of local E&T programs: organization, program design, and program operations.

Local Organization

Local organization of E&T programs varies widely. The first organizational decision is what agency or organization will be responsible for administration of the E&T program at the local level (e.g., the FSP eligibility unit, a separate E&T unit within the local welfare office, or an outside contractor). Additional organizational decisions include which providers will be used for delivering specific services to E&T participants, how these providers are compensated for their efforts, and what performance expectations and reporting requirements are placed on them. Another impor-

registrants, managers may decide what minimum activities a participant needs to complete to be considered in compliance. If participation requirements include unsupervised job search activities, the program design must provide for periodic monitoring of participant activities by a case manager.

Program Operations

Local Food Stamp E&T operations include procedures for client flow through the program. Key procedures include how participants are recruited or referred to E&T; what type of orientation new participants receive; how applicants are assessed, enrolled, and assigned to service components; and how participants are sequenced through various services. Additional elements of program operations include procedures for compliance monitoring and system responses to noncompliance, and procedures for case management.

Other elements of E&T operations include the characteristics of the services provided by E&T programs. Local programs vary widely in the range of services provided; the content, intensity, and duration of each service; the volume of participants in each service category; and the average expenditure per participant. Of special interest are the characteristics of the clients participating in each service category. Finally, reported outcomes are an important aspect of local program operations, including reported employment, case sanctioning, and case closure rates.

ORGANIZATION OF THE FINAL REPORT

This final report has two volumes. Volume I describes findings from the cross-site analysis; Volume II presents brief descriptive profiles of each of the 15 study sites. The contents of the chapters in Volume I are as follows. Chapter 1 provides a brief history of the Food Stamp Employment and Training Program, summarizes the research objectives of the study, and describes the conceptual framework that has guided data collection and analysis.

Chapter 2 describes the study design and methodology. Included in this chapter are descriptions of the procedures used to select 15 local E&T programs for study; the case study methods used to collect detailed information on the organization, design, and operation of the E&T program in the 15 study sites; and the data analysis methods used in preparing individual site descriptions, cross-site comparisons, and explanations of the factors that influence variations in the E&T program across the case study sites.

Chapter 3 describes the variations in the local context within the Food Stamp E&T programs operated in the 15 case study sites. These include different degrees of urbanization and overall county population, different economic conditions and labor market opportunities, and different public assistance contexts. Also described are variations in how E&T administrators perceived the local E&T work registrant population.

The actual contents of different E&T service components are described in Chapter 4. Separate sections describe the content and frequency of participation in job search, job search training and preemployment training, education, vocational training, and community work experience across the case study sites.

Chapter 5 describes the variations in E&T client flow and participation patterns across the study sites. Separate sections of this chapter describe how the E&T program works at the local site level for the following activities: work registration and exemption policies and practices; E&T orientation, enrollment, and assignment to services; required service components and service sequencing; client tracking and case management; and noncompliance and the sanctioning process.

In Chapter 6, we describe some of the key program organizational and service design decisions that shaped the E&T programs in the 15 case study sites and discuss the different factors that influenced program organization and design. Issues discussed in this chapter include the role of state versus local site managers in shaping local E&T programs; the perceptions of state and local policymakers about the goals and objectives of the E&T

program; and the state and local decisions about funding levels and budgeting, program organization, client targeting, service components, consolidation with other work programs, and coordination with other local employment and training services.

In Chapter 7, we describe the program reporting and accountability practices in the study sites and the implications of these practices and procedures for accounting for E&T operations and outcomes at the local and state levels. Current accountability issues include the tracking of participation in services received through nonfinancial referral linkages. Future accountability issues include the ability to track client characteristics and outcomes for planned outcome-based performance standards.

Chapter 8 discusses several strategies or options for consideration at the state and local site levels to promote the employability development focus of the Food Stamp E&T Program. Various options include increased client targeting, revised service content and service sequencing, improved service coordination linkages, and greater program accountability for the achievement of employment outcomes.

REFERENCES, CHAPTER 1

Abt Associates, Inc., "Evaluation of the Food Stamp Employment and Training Program Final Report: Volume I." U.S. Department of Agriculture, Food and Nutrition Service, Office of Analysis and Evaluation. Alexandria, Virginia, June 1990.

Auspos, P., "Bibliography and Review of Research Findings Relevant to Employment Training Programs for Food Stamp Recipients." Manpower Demonstration Research Corporation, New York, May 1986.

Brandeis University and Abt Associates, Inc., "Food Stamp Work Registration and Job Search Demonstration: Final Report." Brandeis University, Waltham, Massachusetts, August 1984.

2 STUDY DESIGN

OVERVIEW

Extensive case studies of 15 representative but diverse local E&T programs were conducted to understand how the Food Stamp Employment and Training Program operates at the local level and why it works the way it does. A multiple case study method allowed us to capture the variations in design and practice as comprehensively as possible.

Each of the 15 site visits involved detailed discussions with relevant staff at the state and local levels, document reviews, and observation of program practices. Depending on the complexity of the state and local programs, visits were conducted by one or two site visitors over a 4- to 8-day period between April and October 1991.

On completion of each visit, site visitors prepared narrative site reports. The complete narrative for each site was used as an internal working document for conducting cross-site comparisons and cross-site analysis. In addition, a descriptive profile describing the E&T program in each local site was prepared. (Descriptive profiles may be found in Volume II of this report.)

The remainder of this chapter describes the design of the study. First, the selection of the state and local samples is explained. Next, the methodology used for the multiple case studies is described, including how the site visits were conducted, the preparation of the case study narrative and descriptive profile for each site, and the conduct of the cross-site descriptive and explanatory analysis.

SAMPLE OF STATES AND LOCAL SITES

To meet the objectives of providing detailed individual descriptions of the design and operation of the Food Stamp E&T Program in 15 representative local areas as well as producing a cross-cutting report that describes the variations in program design, development, and implementation, it was essential that the sites selected be typical yet reflect the variation in policy, operational, and economic contexts that occur in the nation.

Because only 15 sites were to be selected, stratified random sampling was used to provide variation on important dimensions of the contexts within which the local Food Stamp E&T programs operate and the broad features of the E&T service designs selected at the state or local level.¹ A two-stage sample selection process was used to take advantage of the distinction between variables measured at the state and local levels. First, a sample of 15 states was selected. Then a sample of 15 local agencies, one in each state, was selected. The resulting sample of 15 Food Stamp agencies (FSAs) should be considered typical of the variation in the services provided to all FSP mandatory work registrants nationwide, rather than as representative of the 15 sample states. Fourteen of the 15 sites were county units of government. In the 15th site (in a state that has both cities and counties as units of government), the local site was a municipality.

To provide a sample that would be representative of all individuals subject to the E&T participation requirement and that contained an appropriate mixture of large and small agencies, sampling was done with probability proportional to program size. At the state level, size was measured by the number of Food Stamp Program mandatory nonexempt work registrants. At the county level, the number of Food Stamp recipients was used as the measure of program size. (This was the best measure available at the local level.)

¹ The dimensions selected met two criteria: they were likely to strongly affect E&T program operations in ways that are of interest to policymakers, and data were available or acquirable at the time of sample selection.

State Selection Criteria and Sampling Procedures

Three state-level criteria were chosen as the stratifying variables in selecting the state sample:

- Whether the Food Stamp E&T Program was state administered or locally administered. We anticipated that many of the client targeting policies, organizational arrangements, and service designs for the E&T Program in state-administered systems would be made at the state level and would be relatively consistent throughout the state. In contrast, we expected that in county-administered systems a number of program organizational and design decisions would be made by local policymakers. Thus, our sample reflects the distribution of state-administered and county-administered systems (adjusted for program size) for the nation as a whole.
- Whether the state offered an ongoing General Assistance (GA) Program for employable individuals at the state level or in the most populous county. In states with a GA program, GA recipients generally comprise a major proportion of mandatory participants in the Food Stamp E&T Program. Some of the states have taken advantage of the overlap to design consolidated or coordinated work programs for GA and Food Stamp recipients. Others continue to operate separate work programs with little coordination of services or funds. Thus, variation on this dimension was believed to have important implications for the types of clients served by the Food Stamp E&T Program and, consequently, for the design and implementation of such programs. The sample of states reflects the distribution of states with and without potential overlap of the GA and Food Stamp work programs (adjusted for program size) for the nation as a whole.
- Whether the state plan for Food Stamp E&T services placed a high, medium, or low emphasis on job search or job search training components.² Ideally, this variable would have been a local-level measure because the state average in county-administered systems may disguise substantial variation from local site to local site. However, the data were available at the state level and not at the local level. This variable was chosen simply to represent the variation (adjusted for program size) across the nation.

The state sample resulting from this stratified selection procedure consists of 6 county-administered and 9 state-administered E&T programs; 7 states with ongoing GA benefits for employable individuals and 8 states

² The emphasis on job search and job search training was obtained from FNS statistics for FY 89, as reported by the individual states. High emphasis was defined as 75% or more of all E&T placements in these services, medium emphasis as 50% to 75% in these services, and low emphasis as less than 50% in these services.

without; and 7 states with a high emphasis on job search or job search training, 3 states with a medium emphasis, and 5 states with a low emphasis on job search or job search training in their E&T design.³

Although we formally stratified on the three criteria described above, the sample's representativeness on several additional state-level variables was also maintained:

- The level of state fiscal effort on E&T, measured by state expenditures as a percentage of the total E&T budget. States vary widely in the extent to which they supplement the federal formula funds. This affects the total size of the E&T program as well as the intensity of the services that can be provided to each participant.
- The percentage of all mandatory work registrants who are exempt from E&T participation. States exempt varying proportions of their total mandatory work registrant pools from E&T participation using a variety of categorical and individual criteria. The exemptions may affect the client pool and, consequently, the design of the E&T program.

County Selection Criteria and Sampling Procedures

The local site sample was stratified on two county-level criteria:

- Whether the local site had high, medium, or low unemployment.⁴ We anticipated that the health of the local economy measured by local

³ Of the 15 states initially selected, 3 declined to participate in the study and were replaced with other states from the same sample cells.

⁴ Unemployment data were obtained from the Bureau of Labor Statistics Local Area Unemployment Statistics for 1989. The unemployment rate categories were created so that approximately one-third of all Food Stamp recipients in the sample states were served by counties assigned to each category. Thus, for example, the definition of low unemployment was established such that 33.06% of all Food Stamp recipients in the sample states were served by counties in this category. The numerical definitions thus established were: Low--at or below 5%; Medium--between 5% and 7%; and High--at or above 7%. Because of the recession, the levels of unemployment at study sites during FY 91 were somewhat higher than those used to select the sample.

- The percentage of all placements that are voluntary. Most states have only a small percentage of voluntary placements, but a few place a high emphasis on serving volunteers. The emphasis on volunteers may also affect the design of the E&T program.
- Geographic distribution. The sample was designed to include representation from each of the seven Food Stamp Program Regions. unemployment rate would be important in influencing the volume and characteristics of mandatory work registrants in the Food Stamp Program and the number and types of employment opportunities available to E&T program participants. Therefore, the sample was stratified on the extent of unemployment so that the local sample was a representative mix of local economic conditions.
- Whether the local site was characterized by high, medium, or low urbanization.⁵ We anticipated that the organization and design of the Food Stamp E&T Program would differ substantially between urban and rural settings because of variations in the number and characteristics of mandatory registrants, total E&T funding levels, types of jobs available, the extent of other local employment and training resources, and transportation barriers to program participation and employment. We therefore ensured that the sample consisted of a representative mix of urban and nonurban settings by stratifying on the percentage of the county population that is urbanized.

The sample consists of 8 counties with high urbanicity, 4 with medium urbanicity, and 3 with low urbanicity. Six counties with high unemployment were selected, 5 with medium unemployment, and 4 with low unemployment. Table 2-1 shows the characteristics of each site in the sample by the state-level and county-level stratifying variables.

CASE STUDY METHOD

Site Visits

Depending on the size and complexity of the local E&T program, the case study was conducted by either a single site visitor or a two-person team.

⁵ The urbanicity categories were created to reflect common use of the terms high, medium, and low urbanicity. The following are the categories used: Low--below 60% population in urbanized area; Medium--60% to 90% population in urbanized area; High--at or above 90% population in urbanized area.

Table 2-1

LOCAL SITES BY VARIABLES USED IN SAMPLE STRATIFICATION

Local Site	Level of Administration		Ongoing GA Program for Employables*		Emphasis on Job Search or Job Search Training			Urbanization			Extent of Unemployment		
	State	Local	Yes	No	High	Medium	Low	High	Medium	Low	High	Medium	Low
Allegheny County, PA	X		X				X	X					X
Caddo Parish, LA	X			X		X			X		X		
Campbell County, TN	X			X	X					X	X		
Galveston County, TX	X			X		X		X			X		
Hinds County, MS	X			X			X		X			X	
Hudson County, NJ		X	X		X			X				X	
Jefferson County, CO		X		X	X			X					X
Kootenai County, ID	X			X	X					X		X	
McCurtain County, OK	X			X	X					X	X		
Merced County, CA		X	X		X				X		X		
Montgomery County, OH		X	X				X	X				X	
Norfolk City, VA		X		X	X			X				X	
Suffolk County, NY		X	X			X		X					X
Wayne County, MI	X		X				X	X			X		
Woodbury County, IA	X		X				X		X				X

* Although the initial stratification was based on the existence of a GA program statewide or in the most populous county, the variable as displayed in this table indicates whether a GA program existed in the sample county.

The site visits, which ranged from 4 to 8 days, consisted of the following activities:

- Review of existing documents. The review of existing documents provided substantial information about goals, organizational structures, coordination arrangements, and operational procedures of the E&T programs. The types of documents reviewed consisted of descriptive material on the state or local E&T program, information about the local economy and demography, and descriptive information on local welfare programs and local employment and training resources (e.g., JTPA, JOBS, GA work programs, etc.).
- On-site discussions with key respondents. At the state level, discussions were conducted with program administrators. At the county level, discussions were held with local administrators, E&T program operations staff, providers of E&T component services, and representatives of other local employment and training services.
- Observations of service delivery. Observations of ongoing services were integrated into the on-site daily schedule. These observations provided information about the intensity of the service, the actual content of the service provided, the quality of instructional methods, and the communication styles used by trainers and case managers.

The observations conducted depended on the service design of the local site and the schedule of activities on the days of the site visit. Examples of activities observed included orientation to the E&T program, assessment/development of service plans, individual counseling or job search monitoring sessions with a caseworker, group job search training or preemployment training sessions, and other service components, such as worksite observations for work experience or classroom training sessions for basic skills or occupational skills training.

- On-site reviews of client files. A review of 5 to 10 randomly selected client files was conducted at each local site to document how clients were assessed and matched to services, how program participation and outcomes were documented, and how typical clients sequenced through the available services over time.
- Collection of aggregate program statistics. To the extent they were available, aggregate statistics on E&T programs in the sample state and/or local site were collected to provide additional information about who was being served, the type of services being received by various participants, and how program resources were allocated among different services and different types of participants.

Table 2-2 summarizes the topics covered in data collection activities for each case study site.

Table 2-2

COMPREHENSIVE CASE STUDY DATA COLLECTION TOPICS

- I. Overview of Food Stamp E&T Organizational Structure
 - A. State and Local FSA Roles and Responsibilities
 - B. Description of State Administrative Organization
 - C. Organization of Local E&T Administration
 - D. Organization of Local E&T Service Delivery System
- II. Overview of Local E&T Project Area
 - A. Size of Project Area: Population and Geographic Extent
 - B. Economic Conditions
 - C. Demographics
 - D. Public Assistance Context
- III. History of Local Work Programs for Public Assistance Recipients
- IV. E&T Program Goals and Priorities
 - A. Overall Program Goals and Objectives
 - B. Client Targeting Priorities
 - C. Effect of Goals and Priorities on Service Design
- V. Description of Services and Service Packages
 - A. Client Flow and Service Sequencing
 - B. Content and Frequency of Use of Different Services
 - C. Allocation of Program Resources
- VI. Extent and Types of Consolidation and Coordination Between E&T and Other Local Employment and Training Programs
 - A. Description of Local Programs with Coordination Linkages with E&T
 - B. Description of Local Programs without Coordination Linkages with E&T
- VII. Administrative Procedures and Issues
 - A. Data Collection
 - B. Reporting Practices
 - C. Program Monitoring
 - D. Selection and Oversight of Service Providers
 - E. Influence of Impending Outcome-Based Performance Standards
- VIII. Profiles of E&T Participants Served and Services Received

Data Analysis

The first phase of data analysis involved the preparation of detailed case study examinations of the design and implementation of the Food Stamp E&T programs in each of the 15 local sites. Initial cross-site analysis described the variations in program organization, program design, and program operations across the study sites. Descriptive typologies were developed to compare and contrast different client targeting, program design, and coordination strategies used by local program managers to further their E&T program goals under various local conditions. Cross-tabulations and case comparisons were used to describe the relationships among these variables. Each distinct phase of data analysis is described below.

Within-Site Analysis

The within-site analysis consisted of two stages: the preparation of individual program descriptions and an explanatory analysis of the development of the E&T program at each individual site.

The first step in the within-site analysis was the individual site description. Detailed site descriptions were prepared to identify the aspects of program organization, service content, and operational procedures that differentiate E&T services from site to site. These individual program descriptions were documented in two distinct formats for two different audiences.

A comprehensive site narrative, prepared at the conclusion of each site visit by the field researchers, was a compendium of the information collected during the site visit across all data sources, organized according to the key study issues. The comprehensive site narratives included assessments by the site researchers of the factors influencing local decisions about the design and organization of the E&T program. They were used as internal working documents and formed the basis for the cross-site analysis and preparation of this report.

In addition, descriptive profiles, summarizing the design and organizational features of the E&T program in each local site, were prepared. The purpose of these documents is to describe and disseminate information about variations in E&T program goals and objectives, organizational structures, service designs, and client targeting policies across the sample sites. The descriptive profiles are included in Volume II of this report.

The second step in the within-site analysis was a within-site explanatory analysis. After describing the E&T program in each site, the field researchers and other project staff reflected on the patterns described in the case study report and developed hypotheses about why the Food Stamp E&T Program unfolded the way it did in that site. Among the issues addressed during this analytic stage were the following:

- How the administrators of each local program viewed the objectives of the E&T program and how that view influenced their program design and organizational choices.
- What strategy, if any, program managers were trying to implement in terms of matching program resources to local needs.
- Why the decision was made to integrate (or not integrate) the E&T program with other local employment programs, and what the consequences were for program design, costs, client flow, and outcomes.
- How recent shifts in federal program priorities and proposed performance measures influenced each local program, and why the local managers reacted the way they did to these outside influences.

Cross-Site Analysis

The cross-site analysis consisted of two stages: descriptive cross-site comparisons and cross-site explanatory analysis. During the cross-site analysis, the 15 sites were compared on standardized categories designed to capture the variation described in the individual case study write-ups. These standardized categories were used to compare and contrast all 15 case study sites and their characteristics on a variety of program dimensions, including, for example:

3 VARIATIONS IN LOCAL CONTEXT

The 15 sample sites included in this study represent a variety of local conditions under which the Food Stamp Employment and Training Program operates: different degrees of urbanization and overall program scale, different economic conditions and labor market opportunities, and different public assistance contexts. In this chapter, we describe how these local contextual variables differed across the sample sites.⁶ Chapter 5 describes how these variations affected Food Stamp E&T Program design decisions.

VARIATIONS IN URBANIZATION AND SIZE OF COUNTY POPULATION

Table 3-1 describes the variations in population size and urbanicity across the sample sites.

Sites with Low Urbanization

Three of the 15 sample counties were largely rural in character, with only 30% to 50% of the population living in urbanized areas as defined by the U.S. Census. The total county populations ranged from 40,000 to 70,000.

In each of the rural counties, E&T services were provided at a single location. Because these counties were generally quite large geographically, transportation to the E&T service site and/or to local employers was difficult. No public transportation was available in these sites. Mandatory work registrants from outlying areas in these counties were frequently given individual exemptions from E&T participation because of their remote locations.

⁶ Although, as mentioned in Chapter 2, one of the local sites was a city, in this report we will refer to all 15 sites as "counties" for simplicity.

Table 3-1
FEATURES OF THE LOCAL CONTEXT

Site	Population	Urbanization	Unemploy- ment	Proportion of County Population Receiving Food Stamps	Individuals Not on Public Assistance as a Proportion of Food Stamp Caseload
A	650,000	High	10%	8%	21%
B	270,000	High	6%	11%	40%
C	40,000	Low	22%	21%	74%
D	200,000	High	7%	10%	70%
E	40,000	Low	11%	21%	55%
F	440,000	High	3%	2%	48%
G	1,300,000	High	7%	3%	21%
H	250,000	Moderate	6%	17%	65%
I	270,000	Moderate	8%	17%	68%
J	100,000	Moderate	4%	7%	38%
K	160,000	Moderate	14%	16%	19%
L	70,000	Low	8%	7%	68%
M	1,370,000	High	4%	9%	33%
N	2,100,000	High	8%	17%	10%
O	570,000	High	5%	9%	29%

* Alphabetical letters were randomly assigned to states and the study sites. To preserve confidentiality, states and sites will be identified by the same letter in tables throughout this report.

The three rural sites were also characterized by limited labor market opportunities, which made it difficult to achieve E&T program objectives. In one site, access to educational institutions was also very limited.

One state stopped operating the Food Stamp E&T program in one of the rural sample sites in mid-year (the month after the site visit) because of the low number of participants and the absence of jobs in the local labor market. This site had experienced sharp declines in the previously dominant coal, timber, and textile industries, and was reported to have 22% unemployment at the time of the site visit.

Sites with Moderate Urbanization

Four sample counties were moderately urbanized, with 60% to 90% of the county population living in urbanized areas. Each of these counties was dominated by a single city of small to moderate size, surrounded by small towns and/or agricultural lands. The total county populations ranged from 100,000 to 250,000.

Although public transportation was usually available in the center city, transportation available to the outlying areas of the county was generally limited. Residents of outlying areas were often given individual exemptions for lack of transportation if they did not have access to an automobile.

The level of unemployment varied across these counties, but the generally small, self-contained labor markets lacked the varied job opportunities available in the larger urban areas.

Sites with High Urbanization

Eight sample counties were highly urbanized, with 90% or more of the county population living in urbanized areas. Total county populations ranged from 200,000 to 2.1 million. Five sites included central cities, and three were suburban counties adjacent to large central cities.

Some of the highly urbanized counties had multiple E&T service sites; others served all E&T clients from a single location. The suburban counties tended to have densely populated areas adjacent to the center city, as well as more remote sections. Good public transportation systems were available in some sites, but did not always serve all portions of the county. This was especially problematic in one site in which employers and middle-class residents had migrated out to the suburbs, leaving a largely minority low-income population in the central city without adequate access to jobs in the outlying areas.

The range of job opportunities was more varied in the highly urbanized sites, although the level of unemployment varied widely across sites, ranging from 4% to 10% at the time of the site visits.

VARIATIONS IN THE LOCAL ECONOMY AND LABOR MARKETS

Table 3-1 also summarizes the unemployment levels across the sample sites. A decade of decline in the manufacturing sector in many parts of the country, along with the current recession, had left few of the sample sites unscathed. In a number of sites, unemployment levels were continuing to rise during FY 91.

Sites with Low Unemployment Rates

Four sample sites had unemployment rates at or below 5% during 1991. One of these was a growing suburban county with a high median income, adjacent to a major metropolitan center. County residents had access to jobs throughout the metropolitan area and, in addition, benefited from aggressive county economic development efforts to recruit new companies to the county. Construction, services, trade, and manufacturing were all stable or growing industries in this site. The labor market in a second site with low unemployment had job opportunities in government, services, and the meat-packing industry. However this site reported a trend on the part of local employers toward offering part-time jobs without benefits.

The remaining two sites with low unemployment rates both had suffered substantial dislocation in the high-wage industrial sector during the 1980s. Although overall unemployment rates were low in these sites during 1990 and 1991, most available jobs tended to be in the clerical, health care, and service sectors, which offered lower wages and, in some cases, required higher levels of formal education than the jobs that had been lost over the last decade.

Sites with Moderate Unemployment Rates

Four sample sites had unemployment rates greater than 5% and less than 8% during 1991. In one site, the "downsizing" in the financial service sector in the metropolitan area had caused a sharp increase in unemployment during the last year, from 5% to 7%. Layoffs in this county included workers in government, high technology, construction, and banking/insurance jobs. Another site with moderate unemployment had suffered large-scale layoffs in the shipbuilding and military/defense industries, but had jobs available in government and retail trade. In this labor market, unskilled jobs tended to be hourly, with no fringe benefits.

In a third site, jobs in the service sector and resort industry predominated. General growth and expansion in this urban area were being temporarily slowed by the recession. In another site with moderate unemployment, jobs in government and electronic assembly were still available, but prevailing wages were very low (minimum wage or just above).

Sites with High Unemployment Rates

Seven sample sites had unemployment levels in excess of 8% during 1991, and four of these sites had "double digit" unemployment (unemployment at a rate of 10% or higher). The employment opportunities in these sites were limited. In some sites, the economic doldrums were the result of a decade of decline in a major industry, such as the automobile industry, that had reverberated throughout the local economy.

In other sites, high unemployment rates resulted from an undeveloped rural economy with a very seasonal employment base or a stagnant economy still dominated by agriculture. Several other sample sites with high unemployment rates were dependent on a single industry or a large employer.

Additional problems in several of these sites included a mismatch between the high skills required by employers for new jobs and the relatively low educational level of the unemployed population pool. In other sites with high unemployment, the available jobs were low-skill jobs paying low wages.

As discussed in the next chapter, general conditions in the local labor market influenced the likelihood that Food Stamp E&T participants would find work. As staff in one E&T program stated, "It's difficult to plan for job development services when jobs aren't available." Furthermore, in sites with predominantly low-wage jobs, even if E&T participants located jobs, wages were often too low for full self-support.

VARIATIONS IN THE PUBLIC ASSISTANCE CONTEXT

The sample sites varied in the extent of the local population that received Food Stamps and the proportion of Food Stamp recipients who also received benefits from other federally funded public assistance programs. Where General Assistance (GA) benefits were provided by states or counties, sites also varied in whether individuals receiving both GA benefits and Food Stamps were required to participate in the Food Stamp E&T Program.

Proportion of the County Population Receiving Food Stamps

Table 3-1 displays the variation in the proportion of the county population receiving Food Stamps across the sample sites.

Counties with Low Food Stamp Participation Rates

In five sample sites, 8% or less of the county population was on the Food Stamp rolls as of January 1990. In two of these counties, the

participation rate was less than 3%. Three of these counties were suburban counties in major metropolitan areas, one was a county with moderate urbanization and a low unemployment rate, and one was a rural county with a small population and a high unemployment rate. The total number of individuals receiving Food Stamp benefits in these counties ranged from less than 5,000 to more than 50,000. The Food Stamp caseload had increased sharply in two of these sites over the previous 6 months--by 15% in the rural site and by 52% in one of the suburban sites.

Counties with Moderate Food Stamp Participation Rates

In another four sample counties, between 9% and 15% of the county population was on the Food Stamp rolls as of January 1990. Each of these counties was highly urbanized and contained a central city. Two of these counties had moderate unemployment rates and two had low unemployment rates. The total number of individuals receiving Food Stamp benefits in these counties ranged from 20,000 to 120,000. The Food Stamp caseload had increased by 15% in one of the sites over the previous 6 months, while it was relatively stable in the other three sites.

Counties with High Food Stamp Participation Rates

In the remaining six sample counties, over 15% of the county population was on the Food Stamp rolls as of January 1990. In two of these counties, the participation rate exceeded 20%. Unemployment rates were high in five of these sites. Two of these counties were rural, two were moderately urbanized, and one was a large metropolitan county with a depressed central city core. The total number of individuals receiving Food Stamp benefits in these counties ranged from 7,500 to 360,000. Food Stamp caseloads were relatively stable in these sites between July 1989 and January 1990.

Participation in Other Federally Funded Public Assistance Programs

The percentage of Food Stamp recipients who also received benefits under Aid to Families with Dependent Children (AFDC) or Supplemental Security

Income (SSI) varied widely from site to site, from 26% to 90% of the Food Stamp caseload. In terms of the Food Stamp E&T Program, the relevant measure is actually the inverse of this statistic, or the percentage of Food Stamp recipients who did not receive other public assistance benefits--the non-public assistance or NPA Food Stamp caseload. The variation on this measure across the sample sites is displayed in Table 3-1.⁷

Low Levels of Participation in Other Public Assistance Programs

In six sample sites, more than 50% of the Food Stamp caseload did not also receive public assistance benefits from the AFDC or SSI program. Five of the six sites were located in the Southeast or Southwest Food Stamp regions, and three of the six sites were rural counties. One factor influencing low AFDC participation levels in these sites was the low or moderate level of AFDC benefits available. In three sites, the maximum level of AFDC benefits provided to a one-parent family of three was less than 25% of the 1990 poverty threshold for that size household; in the remaining three sites, AFDC benefits were less than 50% of the 1990 poverty threshold. All six sites were from states that ranked in the lower half of all states in terms of AFDC benefit levels.

Moderate Levels of Participation in Other Public Assistance Programs

In five sample sites, between 25% and 50% of the Food Stamp caseload did not also receive public assistance benefits from the AFDC or SSI program. Four of the five sites were highly urbanized counties. All had low unemployment rates during 1991. In all five sites, the level of AFDC benefits was

⁷ SSI recipients are generally considered unemployable and would be exempt from work registration, while Food Stamp recipients receiving AFDC who are subject to participation in the Job Opportunities & Basic Skills Training Program (JOBS) are exempted from participation in the Food Stamp E&T program. The JOBS program was operational in each of the 15 sample counties included in this study. Thus, the NPA Food Stamp caseload formed the universe from which Food Stamp E&T mandatory work registrants were designated, after the application of additional federal and state exemption criteria.

low or moderate--the payment standard for a one-parent family of three was between 35% and 50% of the 1990 poverty threshold for that size household. AFDC benefit levels in these states were close to the national average.

High Levels of Participation in Other Public Assistance Programs

In four sample sites, less than 25% of the Food Stamp caseload did not also receive public assistance benefits from the AFDC or SSI program. Three of the four sites were in highly urbanized counties, and two had unemployment rates in excess of 10% during 1991. Higher levels of AFDC participation in these states were encouraged by relatively high AFDC benefit levels. In three sites, the maximum level of AFDC benefits provided to a one-parent family of three was 60% or more of the 1990 poverty threshold for that size household; in the remaining site, AFDC benefits were nearly 50% of the 1990 poverty threshold. Three of these sites were from states that were among the top 10 states in terms of AFDC benefit levels.

Existence of General Assistance Programs and GA Work Requirements

Availability of General Assistance

Seven of the 15 sample counties offered no General Assistance (GA) payments to employable individuals. One additional county offered emergency payments for basic living needs, but provided such assistance only once every 12 months.

At the time the sample sites were selected, the remaining seven counties offered some level of General Assistance benefits to employable individuals for more than 1 month each year. In five sample sites, General Assistance benefits were not time-limited. In one site, General Assistance benefits to employable individuals between the ages of 18 and 45 were available only 3 months out of every 12 months. In another site, individuals had to reapply for GA benefits each month. General Assistance benefits were statewide in five sites; they were county funded in two sites.

In response to the state-level fiscal crises, exacerbated by the recession, two sample sites were reducing their statewide General Assistance programs. At the time of the site visit, one county was preparing for the transition from a year-round GA program to a time-limited program that would permit individuals to receive benefits only 6 out of every 12 months. Another sample county was in a state that eliminated its GA program 2 weeks before the site visit for this study took place.

Existence of GA Work Programs and Their Interaction with the Food Stamp E&T Program

Four of the sample sites operated separate work programs for General Assistance recipients. In one site, the GA work program consisted of unpaid work at a job assignment made by the county government that funded and operated the GA program. In the remaining three sites, GA recipients were required to conduct an individual or supervised job search, followed by participation in an unpaid work assignment. As described in more detail in Chapter 6, one of these counties exempted GA recipients from the Food Stamp E&T program as long as they were active in the GA work program. In the other three counties, General Assistance recipients were subject to GA work requirements as well as Food Stamp E&T requirements.

The three remaining counties operated the Food Stamp E&T program as a consolidated work program for GA recipients and Food Stamp recipients. In each of these sites, GA recipients made up a high percentage of all E&T mandatory work registrants and an even higher percentage of E&T participants. The two sites that were cutting back their statewide GA programs were in this group. These changes in General Assistance program designs had important implications for the goals and objectives, service designs, and funding levels of the Food Stamp E&T Program in these states, as described in more detail in Chapter 6.

CHARACTERISTICS OF INDIVIDUALS SUBJECT TO FOOD STAMP E&T REQUIREMENTS

We expected to be able to contrast and compare the extent of job readiness of Food Stamp E&T work registrants across the study sites by looking at aggregate statistics on their ages, levels of education, extent of work experience, and other relevant variables. However, because the current federal reporting requirements do not require states to collect or report these data, profiles of E&T clients were generally not available.

Discussions with state and local E&T policymakers and program operators provided a much more subjective and impressionistic view of the characteristics of E&T work registrants and program participants. Nevertheless, the sample sites fell into several different groupings in terms of their perceptions of the job readiness of E&T work registrants.

Seven of the sample sites characterized the Food Stamp E&T work registrants as generally job ready, with more work experience than AFDC recipients participating in the JOBS program. One site that had surveyed the characteristics of E&T participants had found that 65% had worked within the last 6 months, and that only 5% had no work experience. However, even these sites acknowledged that a subset of Food Stamp E&T participants had more serious employment barriers, including illiteracy, lack of a high school diploma or General Educational Development (GED) certificate, and a lack of life skills or "coping skills."

In contrast, five of the sample sites emphasized the serious employment barriers exhibited by many Food Stamp E&T work registrants. One local E&T policymaker emphasized that the E&T clients in his county were not interested in seeking employment or in participating in education or job training. Instead, this site had a high proportion of E&T work registrants who were homeless and/or in need of psychiatric services. Respondents from another sample site said that a significant percentage of the NPA Food Stamp caseload consisted of individuals who were long-term Food Stamp recipients without recent work experience. Many of these individuals were poorly educated, with less than 8th-grade reading and math skills. The last three sites in this

group targeted GA recipients. One of these sample sites provided GA recipients with 6 months of paid work experience in an attempt to build good work habits and develop work motivation in individuals who had not experienced success in the work world in the past.

The remaining three sites emphasized that the Food Stamp E&T client population was not a homogeneous group, and that E&T clients included both less-job-ready and more-job-ready individuals. This was particularly true in a period of high unemployment, as experienced workers exhausted their unemployment insurance benefits and became mandatory E&T work registrants. One site, in particular, targeted three distinct groups within the Food Stamp E&T work registrant population: job-ready individuals, who made up roughly 10% of the work registrant pool; those who were self-motivated to pursue education or vocational training; and hard-to-serve individuals with multiple employment barriers.

SUMMARY

The 15 sample sites illustrate the varied conditions under which the Food Stamp Employment and Training Program operates across the nation.

Three of the sample sites were largely rural in character, four sites were moderately urbanized, and eight sample sites were highly urbanized. The extent of urbanization was also associated with the total population of the sample counties, which ranged from 40,000 to 2.1 million. The more urbanized sites generally had larger populations, more employment opportunities, and better public transportation than the sites with moderate or low urbanization.

Four sample sites had unemployment rates at or below 5%. However, in several of the sites with low unemployment, job opportunities tended to be limited to sectors of the economy that offered relatively low wages, such as service and clerical jobs. Another four sample sites had moderate unemployment rates--between 5% and 8%. Seven sample sites had unemployment rates in excess of 8% during FY 91, which reduced the likelihood that Food Stamp E&T participants would find work.

The proportion of the county population receiving Food Stamps in the sample sites ranged from 2% to 21%. Counties with low Food Stamp participation rates tended to be suburban counties. Counties with moderate Food Stamp participation rates were highly urbanized, contained central cities, and had low or moderate unemployment rates. Counties with high Food Stamp participation rates tended to have high unemployment. Two of these counties were rural, two were moderately urbanized, and one was a large metropolitan county with a depressed central city core.

AFDC/SSI recipients made up from 26% to 90% of the Food Stamp recipient caseloads in the sample sites. The universe of Food Stamp work registrants in each site was a subset of those Food Stamp recipients who did not also receive AFDC or SSI benefits. The proportion of the Food Stamp caseload that was not on public assistance (NPA) was inversely related to the AFDC payment standard in each sample site.

General Assistance (GA) programs were available to employable individuals in seven of the study sites. However, in response to state-level fiscal crises, exacerbated by the recession, two sample sites were in the process of reducing their General Assistance programs. Four sample sites operated separate work programs for GA recipients, while three counties operated the Food Stamp E&T program as a consolidated work program for GA recipients who also received Food Stamps.

State and local E&T policymakers and program operators had different perceptions of the job readiness of E&T work registrants across the sample sites. In seven sites, E&T work registrants were characterized as generally job ready. In contrast, five of the sample sites emphasized the serious employment barriers facing many Food Stamp E&T work registrants, including homelessness, mental disabilities, and long-term patterns of dependency. The remaining three sites emphasized that E&T clients were not homogeneous but included both less-job-ready and more-job-ready individuals.

4 SERVICES PROVIDED TO E&T PARTICIPANTS

This chapter describes the variations in the services provided to E&T participants across the 15 sample sites. The focus of this chapter is on the actual content of the services provided to participants or the activities required of them in different components. In addition, we discuss how frequently different types of services were provided to E&T participants, how different services were used as part of the overall Food Stamp E&T program, and how different factors influenced these variations from site to site.

AVAILABLE SERVICE COMPONENTS

Sample sites varied in the number of different components included in local E&T plans, the names given to the formal components, and the actual number of distinct service options available to E&T participants. The number of formal E&T service components ranged from 1 to 10. One site had a single E&T component, 5 sites had 3 components, 2 sites had 4 components, 1 site had 5 components, 4 sites had 6 components, and 2 sites had 10 components.

In describing the different components available across the sample sites, we have attempted to impose a standard set of categories based on the content of the components, rather than using the names attached to different service components in a particular state or local site. For example, study sites attached the name "job club" to very different activities: from group job search training to supervised job search to preemployment training. Furthermore, "job club" components often included a combination of job search training/preemployment training and job search activities. In this chapter, activities have been categorized by their actual contents, rather than how they were labeled by the local site in which they occurred.

The categories used to describe E&T service components in the following discussion include: (1) job search or job placement services, (2) job search

training and preemployment training, (3) education and vocational training, and (4) work experience. Within each of these categories, an individual E&T site may have zero components, a single service component, or multiple components. Two sample sites had additional components that do not fit into the above categories. One site included assessment as an official E&T service component, and the other reported EDP development as an official E&T service component.

All 15 sample sites offered one or more job search/job placement service components. Eleven sites offered one or more job search training or preemployment training components. Education and/or vocational training was available as an E&T activity in 13 of the 15 sites. Unpaid community work experience was provided as an E&T activity in six sites, while paid work experience assignments were available in two sites. (One site had both paid and unpaid work experience components.)

As described in more detail in Chapter 6, the sample sites can be assigned to three groups based on the most frequently used service component in each site. In the first group, placements into job search accounted for 85% or more of all service placements. In the second group, placements into job search training components predominated. The third group provided education and training services to a substantial proportion of all E&T participants.

In most cases, the E&T service placements reported to FNS consisted of activities provided by E&T staff directly or through referral to another service provider after the individual became an active participant in the E&T program. However, in two sites, some of the vocational training placements reported to FNS as E&T service placements were the result of after-the-fact data tape matches of Food Stamp recipients participating in JTPA services, rather than only active E&T referrals.

JOB SEARCH ACTIVITIES

Among the meaningful differences in the service designs for E&T job search components were the following dimensions:

- Whether the job search activity was a "stand-alone" activity or part of a sequence of services that also included job search training or educational/vocational training.
- How long job search components lasted, how many employer contacts were required (or how many hours of participant effort were required), and whether the job search design emphasized telephone or in-person contacts with employers.
- Whether the design emphasized participant responsibility for planning and initiating employer contacts or E&T staff responsibility for job development and making appropriate job referrals (i.e., job search vs. job development/placement).
- Whether job search activities emphasized fulfilling procedural requirements (e.g., completing a certain number of employer contacts) or finding employment.

Table 4-1 summarizes several of the key variations in the job search components used across the 15 sample sites.

Frequency of Participation in Job Search Components

Each of the sample sites operated at least one job search activity as part of the Food Stamp E&T program. Service components that included job search activities were given a variety of different names: individual or independent job search, supervised or directed job search, job club, and job development or job placement. Five sites had two different job search/job placement components and one site had three different job search/job placement components.

A "stand-alone" job search component was the predominant E&T service provided in 7 of the 15 study sites. In each of these sites, the job search component accounted for 85% or more of all E&T service placements. In four of these sites, job search was either the only required service component or the first required service activity for mandatory nonexempt work registrants. In the remaining three sites that emphasized job search as the primary E&T service component, education and training services were also available to work registrants, but participation in these components was limited.

Table 4-1

FEATURES OF JOB SEARCH COMPONENTS

	Number of Different Job Search Components	Names of Components	Percentage of All Placements	Typically Stand- alone	Typically with Job Search Training	Duration	Number of Required Employer Contacts	Telephone or in Person
SITES IN GROUP 1: JOB SEARCH EMPHASIZED								
A	1	Independent Job Search	100	x		8 weeks	24	In person
B	1	Individual Job Search	94	x		4 weeks (every 6 mos.)	18	Either
C	1	Individual Employment Search	96	x		8 weeks	24	Either
D	1	Directed Job Search	96	x		4 weeks	24	In person
E	2	Independent Job Search	86	x		8 weeks	16	Either
		Supervised Job Search	5	x		Varies	N/A	N/A
F	3	Self-Directed Job Search	75	x		4 weeks	12	Minimum of 8 in person
		Counselor- Assisted Job Search	10	x		Varies	N/A	N/A
		Job Club	12		x	3 weeks	N/A	Telephone
G	1	Individual Job Search	94	x		8 weeks	24	Either
SITES IN GROUP 2: JOB SEARCH TRAINING AND JOB SEARCH EMPHASIZED								
H	1	Independent Job Search	26		x	4 weeks	25	Either
I	1	Independent Job Search	35		x	3 weeks	15	Either
J	2	Job Club	79		x	3 weeks	150	Telephone
		Independent Job Search	6	x		4 weeks	24	In person
K	1	Supervised Job Search	37		x	2 days	12	Telephone
L	1	Supervised Job Search	44		x	8 weeks	24	Either

Table 4-1

FEATURES OF JOB SEARCH COMPONENTS (Concluded)

	Number of Different Job Search Components	Names of Components	Percentage of All Placements	Typically Stand- alone	Typically with Job Search Training	Duration	Number of Required Employer Contacts	Telephone or in Person
SITES IN GROUP 3: EDUCATION AND VOCATIONAL TRAINING EMPHASIZED								
M	2	Job Search Assistance	63	x		8 weeks	N/A	N/A
		Job Search Assistance	5		x	Varies	N/A	N/A
N	3	Job Club	6		x	5 weeks	N/A	N/A
		Individual Job Search	8	x		8 weeks	N/A	N/A
		Job Development/ Job Placement	2	x		Varies	N/A	N/A
O	2	Direct Placement	13	x		Varies	N/A	N/A
		Job Club	14		x	4 weeks	N/A	N/A

Another five study sites required job search activities in combination with the provision of job search training. In these sites, individuals were usually required to enroll in job search training as the first E&T component. Participants completing job search training were then required to conduct a job search. In some of these sites, job search was a separate service component. In other sites, a certain number of required employer contacts were integrated in the job search training component.

Two sites deemphasized job search activities. In these two sites, the majority of E&T service placements were made to education or vocational training components. In a third site, job search was emphasized only for the relatively small proportion of E&T work registrants who were assessed as being job ready (interested in job placement services and with recent job experience).

Content and Delivery of Job Search Activities

All 15 sample sites had at least one job search service component that required participants to contact local employers. In seven sites, the largest job search component was operated in-house by local welfare agency staff. Of the remaining eight sites, four contracted with the Job Service for the administration of participant job search, one contracted with the local JTPA agency, and three contracted with other local public or private agencies.

In two of the sites with multiple job search components, participants could be required to cycle from one job search component to another if they had not obtained employment at the conclusion of the first component, as described below.

- One site operated a 4-week individual job search as the first component required of all E&T participants. If a participant was not employed at the end of this component, s/he could be required to participate in (a) a 4-week job club that included 1 week of job skills training followed by another 3 weeks of job search, or (b) a counselor-directed job search that used frequent meetings with an E&T counselor to guide the individual's job search activities.

- Another site required participants to make 10 telephone contacts a day for 3 weeks as the job search phase of an initial job club. If a participant did not find employment during that component, a second month of individual job search could be prescribed that required 24 in-person employer contacts.

In other sites, multiple job search components provided alternative rather than sequential service assignments. For example, three sites referred E&T participants to either individual job search or job development/placement services. The three sites with job development/job placement components contracted out these components to other agencies (Job Service in one site and private agencies in two sites). The job development components accounted for relatively small proportions of all job search service placements in the sites in which they were used.

In terms of the content of the job search services, the sample sites can be divided into two categories: sites in which job search emphasized procedural requirements for completing a prescribed number of employer contacts, and sites in which it emphasized effective job search methods.

Job Search Components That Emphasized Procedural Adequacy

Most E&T job search designs were oriented to fulfilling the procedural requirements of employer contacts, rather than conducting an effective job search or obtaining employment. Although some sites called their job search components "directed" or "supervised" job search, E&T staff usually played a passive role in supervising participant job search. In 11 of the 15 sample sites, the role of the staff operating the job search component was limited to monitoring employer contacts to ensure procedural compliance, rather than providing advice on how to conduct an effective job search. This was particularly true of the seven sites where job search was a "stand-alone" component, without any link to job search training.

Typically, the participant would meet with the E&T case worker in a group or individual orientation session held at the beginning of individual job search. Orientation sessions usually emphasized how many employer contacts were required and how to document contacts on logs in order to

fulfill the E&T participation requirement, rather than how to generate appropriate job leads. The participant was then responsible for contacting the required number of employers and bringing a list of the completed contacts to a follow-up meeting with the E&T case worker. Typically, the follow-up counselor interviews were scheduled at the end of the first 4 weeks of job search and, if 8 weeks of job search were required in a particular site, again at the end of 8 weeks. On occasion, the E&T case worker might make suggestions about specific employers to contact, but generally the responsibility for generating job leads rested with the participant. In all sites, the staff administering the job search requirement were responsible for reviewing the employer contact logs to see whether the contacts seemed valid; in some sites, a sample of the listed employers was contacted to verify that a job search contact had taken place.

In the five sites that emphasized a combination of job search training and job search, the job search component followed classroom instruction on how to conduct an effective job search. In some sites, the job search was considered the second phase of the job search training service component; in other sites, it was considered a separate service component. However, the characteristics of the job search in most of these sites were very similar to the features of the "stand-alone" job search designs: four of the five sites emphasized documenting a certain number of employer contacts, rather than conducting an effective search or actually locating employment.

In the sites in which job search followed job search training, there was also an increased emphasis on the use of telephone contacts with employers. One of these sites required participants to contact 150 employers over a 3-week period, by making 10 telephone calls a day from the E&T program site, using phones provided for that purpose. Another required at least 2 of the required 25 calls to be made from the E&T office, following up on job leads provided by the E&T counselor.

Job Search Components That Emphasized Effective Job Search Methods

Only 4 of the 15 sites emphasized that employment was the expected outcome of a successful E&T job search and designed their job search

components to promote successful outcomes. Two sample sites provided substantial guidance in conducting a successful job search during the job search component, rather than merely monitoring the procedural requirements of the job search. Another two sites emphasized job placement outcomes for job search by targeting the job search component to a small segment of job-ready participants. Three of the four sites did not require participants to complete a specific number of employer contacts. Instead, they required a certain level of participant effort on job search activities, ranging from 12 hours per month to 20 hours per week. The fourth site had requirements for a specific number of employer contacts but interpreted this requirement loosely if participants were serious about researching and pursuing appropriate job leads.

The contents of the job search components in two of these four sites are described below:

- One rural E&T program provided extensive staff support by means of one-on-one coaching throughout the job search period. In this site, biweekly follow-up contacts between individual participants and E&T program specialists were used to provide assistance and support regarding job search strategies and resume development, as well as coaching about how to get and succeed at job interviews with specific employers. Although the state required 24 employer contacts over an 8-week job search period, the local staff did not interpret the number of contacts as a strict requirement. If participants were pursuing jobs that required extensive research and resume preparation, program staff would reduce the number of different contacts that were required. E&T staff at this site said that they believed that a "guided job search" was more effective than a "shotgun" approach in which participants contacted a large number of employers and targeted entry-level jobs.
- Another sample site provided 4 weeks of supervised job search following 4 weeks of job search instruction to a smaller subset of all E&T participants through contracts with the local JTPA agency and a community college. The contracts with JTPA and the community college emphasized the goal of job placement by setting placement goals for E&T contracts (ranging from 42% to 65% of all referrals). As observed at the provider visited during the site visit, active job search began early during the job search instruction period by having the participants develop job leads and make telephone inquiries of employers using in-class telephones. The program supported participant job search with instructor feedback, peer support and encouragement,

secretarial support for resumes and cover letters, and access to telephones until a job was secured. Participants were urged to return to the program if they lost their next job.

In two additional sites, job search components were oriented to placing participants in jobs, not by offering more intensive staff support but by targeting their job search components to a smaller segment of E&T work registrants who were job ready. In one of these sites, job search accounted for only 10% of all E&T service placements. For this select group of participants, the job search component required 20 hours of structured job search activity per week, rather than a specified number of employer contacts. In the other site, job search was available only for those participants with recent work experience who indicated they wanted assistance in locating employment. Job Service staff, who operated the job search component in this site, then made job referrals for individual clients.

JOB SEARCH TRAINING

Table 4-2 summarizes the key variations in the job search training and preemployment training services across the sample sites, including:

- What proportion of all service placements fell into this category.
- Whether job search training/preemployment components were targeted to all participants, those most job ready, or those not employed after participating in an initial job search component.
- How many hours of job search training were provided.
- Whether the content of the job search training components consisted of topics narrowly focused on the mechanics of job search (e.g., contacts with employers, resumes, job applications, interviews) or on a broader set of topics including career exploration and labor market information, life skills, and/or skills related to successful job performance.

Frequency of Participation in Job Search Training

Some form of preemployment training, job readiness training, or job search training was available to E&T participants in 10 of the 15 sample

Table 4-2

FEATURES OF JOB SEARCH TRAINING

	Percentage of All Placements	Target Population	Duration	Content
SITES IN GROUP 1: JOB SEARCH EMPHASIZED				
A	Not offered			
B	Minimal*			
C	Not offered			
D	Not offered			
E	Not offered			
F	12	Not employed after individual job search	30 hours	Broad: time management, goal setting, job applications, interviewing, resume preparation
G	4	Those having difficulty with job search	12 hours	Broad: appearance, survival skills, goal setting, job seeking, applications, interviews
SITES IN GROUP 2: JOB SEARCH TRAINING AND JOB SEARCH EMPHASIZED				
H	64	All participants	6 hours	Narrow: job applications, resumes, phone contacts with employers, interviewing
I	62	All participants	2 days	Narrow: videotaped lessons and exercises on job seeking, interview techniques, resumes
J	79	All participants	20 hours	Narrow: job applications, resumes, interviews, telephone contacts
K	54	All participants	24 hours	Broad: assessment of vocational interests, skills, job search techniques, budgeting, self-esteem building
L	40	All participants	24 hours	Broad: goal setting, skills assessment, labor market information, job search, keeping the job
SITES IN GROUP 3: EDUCATION AND VOCATIONAL TRAINING EMPHASIZED				
M	2	Those receiving intensive service packages	1 week	Broad: life skills, job-seeking skills
N	6	Job ready	50 hours	Broad: career exploration, resumes, interviews, world-of-work skills
N	4	Less job ready	20 hours per week	Broad: time management, budgeting, work ethic, parenting skills
O	14	Job ready	50 hours	Narrow: job search strategies, interviewing, resume writing
O	13	Less job ready	1 week	Broad: workplace attitudes, self-esteem, survival skills

*Two individuals were referred to and enrolled in a JTPA Job Club through a nonfinancial referral linkage.

sites. (One additional site referred two E&T participants to a JTPA job club that included job search training.) Eight sites used a single job search training/preemployment training component. The remaining two sites each had two components--one oriented to more-job-ready E&T participants, and one oriented to less-job-ready clients. In all but one site, job search training and preemployment training services were provided through group training sessions. In the 10th site, which was located in a rural area, job search training was usually provided through one-on-one counseling sessions with an E&T case worker, except during the winter months, when there were enough E&T clients to run group job readiness workshops.

Five sites emphasized the provision of job search training or preemployment training services to all E&T participants. In four of these sites, placements into job search training components accounted for over half of all service placements. In the fifth site, the job search training component made up only 39% of all placements, but in combination with the job search component it accounted for 82% of all placements.

In the remaining five sites that offered job search training to E&T participants, this component was used less frequently. In four sites, job search training accounted for less than 15% of all service placements. In the fifth site, two different job search training/preemployment training components accounted for about one-fourth of all E&T service placements.

Content and Delivery of Job Search Training

Two of the 10 sites with job search training or job readiness training components operated these components directly, using welfare agency staff. Additionally, one site contracted with the local JTPA administrator for operation of this component, one site contracted with the Job Service, and the remaining six sites contracted with other agencies or organizations for provision of job search training services.

Four sites had job search training workshops that were narrowly focused on the mechanics of job search, while seven sites had job search training

components that covered a wider range of preemployment topics. (The latter include one site that offered both a narrowly focused workshop for job-ready work registrants and a workshop with a broader set of topics for those who were less job ready.)

Job Search Training for All or Most E&T Participants

Five sample sites emphasized job search training as the first service component for all or most E&T participants. However, the duration and number of hours of job search training varied widely among the sites in this group, as did the range of topics covered in workshop sessions.

In two sites, job search training was limited to two or three class sessions totaling 6 to 10 hours. In these sites, job search training focused narrowly on the mechanics of job search, including instruction on job applications, resumes, telephone contacts with employers, and interviewing skills. In one site, the content was presented by the instructor in lecture format, without much opportunity for practice by participants. In the other site, a commercially developed package called "The Choice Is Yours" was used. This package included videotaped lessons that followed the same characters through the different steps of a job search and provided exercises for participants to complete.

In two of the five sites that provided job search training to most E&T participants, job search training sessions were longer. Classroom instruction in job search lasted 1 week in each of these sites and totaled 20 hours of instruction in one site and 24 hours in the other. In each of these sites, the longer duration of the job search workshop permitted more extensive participant practice of job search techniques, including the conduct of "mock" job interviews that were videotaped and then critiqued by the group. One site limited workshop topics to the mechanics of job search; the other site included a broader range of topics for class discussions and participant exercises, including exploration of vocational interests, skills inventories, assessment of academic skills, goal setting, and exercises in household budgeting, in addition to job search techniques.

The fifth site that provided job search training to all or most E&T participants stretched the job search training over an 8-week job search period, with periodic individual or group sessions throughout. The state plan called for a total of 24 hours of job search training over the 8 weeks. During the summer, the volume of E&T clients was so low in this rural area that job readiness training was provided through individual counseling sessions with the E&T case worker. During the winter, group workshops were held twice a week. Topics covered in the individual counseling contacts and group workshops were broad, including setting realistic goals, analysis of individual skills, labor market opportunities, job search techniques, and "keeping the job."

Job Search Training for the Most Job Ready

Two of the 10 sites provided a job search training component targeted to the subset of E&T participants who were most job ready. Both of these sites used individualized service plans for E&T participants rather than a set sequence of services. In these sites, the job search training component accounted for 6% and 14%, respectively, of all E&T service placements. Both sites used outside contractors to provide job search training to job-ready clients.

In these two sites, job search training was quite intensive, lasting 4 weeks and 5 weeks, respectively. The curriculum content was narrowly focused on job search strategies in one site, while a broader range of topics was addressed in the other site, including orientation to the world of work, nontraditional job opportunities, and job search techniques.

Job Search Training for the Least Job Ready

Five sample sites operated preemployment training or job search training for those not employed after an initial job search period (two sites) or those identified as having multiple barriers to employment (three sites). These service components accounted for relatively small proportions of all E&T service placements, ranging from 4% to 13%.

In one site, E&T case workers could require individuals to attend a job search workshop if they failed to find employment on their own after the first month of a 2-month individual job search component. The job search workshop in this site lasted 2 days (12 hours) and covered job search skills as well as life skills, developing personal goals, and overcoming personal barriers.

In another site, E&T participants could be assigned to a job search component as the second component if they were still unemployed after completing a 1-month individual job search. Job search instruction in this site lasted 1 week and was narrowly focused on job search techniques.

In the three remaining sites, hard-to-serve individuals could be assigned to preemployment training components without a prior job search activity. In one site, a "job readiness" component had recently been added to the E&T service offerings to address the attitudinal problems and lack of self-confidence of some E&T participants. The curriculum, designed at the state level, called for 20 hours of structured activity per week for up to 12 months, covering topics such as budgeting, time management, and parenting skills.

Another site reserved a week-long "preemployment training" course for individuals considered hard to place. The curriculum for this course covered workplace attitudes, self-esteem-building exercises, and survival skills. However, in a discussion with the field researchers, the instructor expressed frustration over the lack of motivation among participants, many of whom were present because they were threatened with sanctions if they did not attend.

The third site incorporated preemployment training into intensive (6- to 9-month) service programs that also included basic skills training and occupational skills training for individuals with multiple employment barriers. In one such program, the curriculum included 2 weeks of "life skills" and "preemployment skills" topics at the outset, covering career assessment, client motivation, expectations of the workplace, and job search techniques.

EDUCATION AND TRAINING

Whereas job search and job search training components tended to be designed and operated specifically for Food Stamp E&T participants (or jointly for E&T participants and JOBS and/or GA work program clients in states with consolidated work programs), education and vocational services were usually provided through referral to existing programs using nonfinancial referral linkages. This feature led to several other characteristics of the E&T education and training components, including:

- A variety of different education and vocational training options and service providers, to which participants were referred according to their specific needs and interests.
- Limited access to education and training components, depending on: (1) whether the E&T client was perceived as an appropriate referral by the training provider, and (2) whether there was sufficient funding and service capacity to accommodate the E&T referral.
- Less involvement by the E&T policymakers in the design and content of these services.

Table 4-3 summarizes several of the key features of the educational and vocational training components available to E&T participants. Key features include: how many different components were used; what percentage of all service placements were made to vocational or educational training components; and whether these services were provided using financial contracts or nonfinancial referral arrangements.

States' names for educational and vocational service components varied. Three sites had only a single combined component for education and training. Most sites had several components for training in basic educational skills--e.g., ABE/ESL, GED preparation, ESL--and a single vocational training component. Several sites reported two or more vocational training components, such as on-the-job training, classroom training in vocational skills, and postsecondary education. For the majority of programs, placement in an education component consisted of a direct referral to an existing provider of basic education. However, some sites made referrals to JTPA for placement in an educational program funded through the JTPA system.

Table 4-3

FEATURES OF EDUCATION AND VOCATIONAL TRAINING COMPONENTS

[illegible]

Frequency of Use of Education and Vocational Training Components

Education and/or vocational training activities were included in the E&T service plans in 13 of the 15 sample sites.

Three sample sites were distinguished by the fact that a significant proportion of all service placements were in education or vocational training components. The proportion of placements in education or vocational training ranged from 34% to 57% of all service placements in these sites. A variety of other service components were used in combination with education and training services in these sites. These three sites were characterized by a strong emphasis on individualized service planning. Furthermore, each of these sites strongly encouraged or required educational services for work registrants with limited formal education (e.g., without a GED or high school diploma) or literacy (e.g., reading at or below the fifth-grade level).

In two of the sites with a strong emphasis on education/vocational training, a substantial portion of the E&T program budget was used to create slots for E&T participants in vocational training programs. In these sites, the welfare agency negotiated special E&T service contracts with local training providers. In addition, both sites also referred E&T participants to existing educational programs and vocational training providers through nonfinancial referral arrangements. In all three sites that emphasized the provision of education/vocational training to E&T participants, the E&T budget also contained substantial funding for monthly allowances to reimburse participants for transportation and other expenses incurred while in training, even when the cost of tuition was covered by other community programs through nonfinancial referral linkages.

In the remaining 10 sample sites that offered education and vocational training services, these services generally accounted for only a small proportion of all service placements. Education and vocational training accounted for 5% or less of all placements in six sites, 6% to 10% of all placements in two sites, and 11% to 20% of all placements in two sites.

Participation in education and training components was limited in these sites for several reasons. Since vocational training was often offered as a second component after participation in a required job search, many mandatory E&T work registrants had already found employment, been sanctioned for noncompliance, or left the Food Stamp rolls for other reasons before they ever were required or invited to participate in education and training services through the Food Stamp E&T program. In addition, several study sites that included education and/or vocational training in their approved service plans did not actively refer E&T clients to these services. In several other sites, training providers did not often accept E&T referrals because of funding shortages or screening practices that eliminated individuals lacking educational prerequisites or those who were otherwise perceived as too "high risk."

A lack of formal education (e.g., high school diploma or GED) and/or a lack of basic skills competencies were identified as serious barriers to employment for some E&T participants in 14 of the 15 sample sites. In 13 of these sites, education was available as an E&T service and was encouraged or required for a subset of all E&T mandatory work registrants. Sites varied in the extent of policy emphasis on education, which was usually initiated at the state level, as well as on the level of E&T program funding devoted to purchasing educational services or providing supportive services to E&T participants enrolled in educational components.

Factors influencing the extent of emphasis on E&T educational services included the extent to which the state was able to expend E&T program dollars beyond the 100% formula funding level and the perceived importance of basic education deficiencies as a barrier to employment for mandatory work registrants in the local site. States that did not provide educational activity or that devoted fewer resources to it were more likely to see their E&T populations as job ready or, in the case of one site, as lacking the stable lifestyle necessary to participate in an education component. Another factor influencing the extent to which educational services were emphasized was the required sequence of E&T services (e.g., if job search or job search training was required before access to an education component, many work

registrants had left the Food Stamp rolls or been sanctioned for non-compliance before educational services were offered).

Content and Delivery of Educational Services

Substantial Emphasis on Education for E&T Participants with Limited Formal Education

Three sites placed a substantial emphasis on education as an E&T activity, both in program policy and in the devotion of substantial E&T resources to support participation in educational components. These sites placed substantial proportions of E&T participants into educational services--over 20% of all E&T service placements. Two sites used E&T program resources to purchase education services, when necessary to supplement services available from existing programs. One site used only nonfinancial referrals to existing educational programs but devoted substantial E&T supportive service funds to providing monthly expense allowances to participants in long-term educational programs.

In each of these sites, the Food Stamp E&T program was consolidated with the JOBS program for AFDC recipients. The emphasis on educational services for AFDC recipients participating in JOBS was influential in at least one site in bringing about an increased emphasis on education for all public assistance work registrants, including Food Stamp E&T clients. In the other sites, the emphasis on education in the JOBS program was consistent with, but not necessarily a catalyst for, the substantial emphasis on education for E&T participants.

In two sites, E&T service plans were individualized, based on the particular circumstances of each active participant. In the third site, E&T service assignment rules were more standardized: all E&T participants receiving GA who were between the ages of 19 and 40 were required to participate in an E&T education component, as were all E&T participants without a high school diploma or GED. In addition, those with less than a sixth-grade reading level were required to participate in literacy training.

All three sites with substantial emphasis on education were in metropolitan areas and had a number of different public and nonprofit agencies to refer E&T participants to for educational services.

One of the sites that placed a substantial emphasis on education did not provide educational services in isolation, but encouraged participants to combine basic skills upgrading with participation in occupational skills training. In some instances, contracted service providers sequenced the services, with basic skills remediation preceding occupational skills training. In other instances, curricula combined basic skills and occupational skills training. For example, one provider--an adult vocational school--developed a 6-month curriculum for E&T participants that began with three weeks of intensive ABE/GED instruction. After vocational instruction began, participants who needed to continue basic skills remediation continued to attend basic skills classes for one period each day while participating in occupational skills training.

The second site that emphasized participation in educational services set specific outcome goals for its contractors for participants in each of the basic education subcomponents. For example, E&T participants in remedial education were expected to attain a ninth-grade reading and math level or a two-grade improvement within a calendar year. Participants in ESL were expected to reach a level that would enable them to undertake job search activity, while participants preparing for the GED or completing their high school diploma were expected to gain their certificate before moving to another component.

At the third site that emphasized the provision of educational services, a basic skills class available to E&T participants through nonfinancial referrals to a community-based organization was observed. This class included 2 instructors and 16 students, and used a combination of individual instruction, small-group work, and seat work. Computers were available for interactive drill and assessment of student progress. Observed student-instructor interactions were positive and constructive.

Educational Services Provided to a Small Proportion of E&T Participants

Of the remaining 12 sites, 10 placed a relatively low emphasis on providing educational services to E&T participants. All these sites used nonfinancial referrals to existing providers of education. Educational components in these sites accounted for less than 10% of all service placements.

Within this group there was some variation in the extent of emphasis placed on education. Seven sites offered educational services but failed to encourage participation in educational components. Factors influencing lack of encouragement included: other services were required before educational options, orientation sessions failed to emphasize the availability of these services, or supportive services were not available for participation in these components. In contrast, three sites attempted to encourage participation in educational services by permitting, encouraging, or requiring education as the first service component for clients without a GED or those in need of ESL. However, even in those sites, the rate of participation in educational components was not particularly high.

Educational options in these sites usually included both adult basic education and GED preparation classes. English as a second language training was also provided in sites with sizable non-English-speaking populations when ESL programs were available. The intensity and duration of educational services varied across sites according to the availability of classes. Several sites used the federal minimum level-of-effort guidelines (12 hours for each of 2 months) and offered supportive services only for 2 months of participation per year in any E&T component. One site used the \$25 monthly supportive service allowance to make payments toward the total GED tuition of \$125 (i.e., by paying \$25 a month for 5 months) if the participant did not require a transportation reimbursement. Another site allowed participants to continue in the basic education component for as long as necessary to complete their GED. Limited availability of education slots for E&T participants constrained placements only in the rural sites where educational resources were most limited.

Among the barriers to providing more intensive educational services in these E&T sites were the decision to emphasize job search or job search training as a required first component and the limited availability of state funding to expand the total E&T budget (using state funds that would be matched with additional federal funds). States that were able to expend substantial state funding were able to offer more intensive basic education components. Differences in the educational level of the client population did not appear to account for the differences in program emphasis. Additionally, the limited assessment of work registrants' basic skills deficiencies at the outset of E&T participation constrained the ability of E&T case workers to make more widespread referrals to basic educational services.

Educational Services Not Provided

Two study sites did not place any emphasis on education and did not offer any educational services to E&T participants. One site chose not to provide education because local policymakers did not perceive lack of education as the primary cause of their Food Stamp population's unemployment. Instead, the E&T service design in this site concentrated on addressing motivational problems through job search training and work experience. In another site, staff believed that a large proportion of the mandatory Food Stamp E&T work registrant population needed intensive mental health services before they could participate in employment and training activities. Because they did not have a program that could provide that level of intensive service, they had elected to provide minimal E&T services that did not include education.

Content and Delivery of Vocational Training

Substantial Emphasis on Vocational Training

The same three sites that emphasized the delivery of educational services to E&T clients also devoted considerable resources to the provision of vocational training to E&T participants. In these sites, the Food Stamp agency negotiated contracts with individual vocational service providers or

the JTPA system for services to supplement those available through nonfinancial referrals. Two of the three sites also offered postsecondary education as a separate component for E&T participants. These sites also used E&T funds to reimburse participants attending vocational training for the costs of transportation, child care, and other expenses.

In these sites, vocational training services accounted for at least 20% of all E&T service placements. Because each of these sites was part of a large metropolitan area, a wide range of vocational training providers were available. The E&T programs took advantage of these providers through contracts with public, nonprofit, and proprietary training institutions, as well as through nonfinancial referral linkages to community colleges, where participants could enroll in 2-year training programs. Training was available in a variety of vocational areas, including accounting, word processing, carpentry, and medical receptionist. One site contracted with a proprietary college for the provision of a clerk/typist course for E&T participants. This course used the same syllabus as another course provided to the general public, but a smaller class size so participants could receive more individualized attention. Many of these vocational training programs also offered job development and placement assistance to participants before and after graduation.

Vocational Training Provided to a Small Proportion of E&T Participants

Ten sites used nonfinancial referrals to the local JTPA system as the only way to provide vocational skills training to E&T participants. Services that could be accessed via JTPA referral in most sites included classroom training in occupational skills and on-the-job training positions with local employers. (In some sites, basic skills classes and job search/job readiness classes were also available from the JTPA system through nonfinancial referrals.)

The percentage of all E&T placements in the vocational training components was very low in these sites, ranging from 1% to 10% of all service placements. As with educational services, factors influencing the low rate of participation in vocational training components included:

- A perception that the lack of vocational training was not the primary reason for unemployment within the E&T population.
- Service sequencing regulations that usually delayed referral to vocational training until after participation in a job search or job search training component.
- A lack of information about vocational training options provided to E&T work registrants during orientation sessions.
- Limited numbers of referrals to JTPA by E&T case workers or, alternatively, referral of all E&T work registrants to JTPA (in one site), which made the referral essentially meaningless.

Access by E&T participants to vocational training classes was also constrained by the limited availability of JTPA funding compared with the demand for services in many local sites and the inability of JTPA service providers to accept all referrals. In at least three of the local sites, local JTPA service delivery areas had encountered reduced JTPA funding, which led to waiting lists for services and made it unlikely that a JTPA slot would be available at the time an E&T client needed a component assignment.

In addition, client targeting policies implemented by JTPA service systems often left Food Stamp E&T clients out of any priority target group. On the one hand, E&T referrals were often perceived as less hard to serve than AFDC clients and failed to qualify for JTPA welfare client targeting goals; on the other hand, they were perceived as too high risk to enroll in large numbers in programs where high success rates were seen as important. Screening out of less-job-ready E&T clients occurred either at the point of referral, where E&T case workers actively screened potential clients for JTPA, or on referral to the JTPA system, where additional assessments were performed. If clients referred by E&T were not deemed appropriate for JTPA services, they were referred back to E&T.

Another difficulty encountered was that tracking clients after referral to the JTPA system has proven difficult, and this difficulty may in fact deter E&T case managers from making referrals. (See Chapter 5 for more detail on client tracking and JTPA.) Relatively few sites in this category were able to provide ongoing case management/counseling contacts to individuals participating in vocational training components.

Among the sites with moderate emphasis on vocational training was one site in which the E&T case worker was active in facilitating the initial referral to JTPA for individual clients and following up the referral to determine whether the referral fell through, in which case further assistance was offered. An example using the experience of an individual E&T client illustrates the high quality of case management of vocational training services in this site:

After an initial assessment revealed that the E&T participant performed well on a math and reading test, the E&T program specialist discovered that the individual had a work history in construction and that physical injuries prevented him from continuing in that field. The program specialist, on finding that the client was interested in mechanical/ electrical drafting techniques, reviewed course offerings at the local community college, called the admissions offices, and determined that the drafting courses were already full but that one of the prerequisite courses was available. The E&T client was informed that the E&T program could help with transportation and provide a certification for a Pell grant application, although it could not assist with tuition costs. The E&T program specialist provided the participant with a contact person at the community college and several other service referrals. The client was given an assignment to research the available courses in more detail and the funding options available to him and to return to the E&T program specialist in 1 month for a follow-up interview.

This level of involvement in the content of vocational training options and coordination with vocational training providers, including JTPA, was rarely practiced at the E&T sites observed for this study. More often, clients referred to vocational training were expected to negotiate their own way to an appropriate course.

Vocational Training Not Provided

As with education, 2 of the 15 sample sites offered no vocational training components to E&T participants. In one of these sites, individuals were encouraged to apply to the JTPA system after completing the formal E&T service components. However, participation in these services was neither tracked by the E&T system nor reported as an E&T service placement.

WORK EXPERIENCE

Table 4-4 summarizes the features of work experience components across the study sites. Unpaid community work experience (CWEPE), or workfare, was an E&T service component in six of the local sites visited for the study. One of these sites also offered paid work experience through the Food Stamp E&T program, as a 100% state-funded component. In two other sites, unpaid work experience was an optional component included in the state plan, but the local site had not elected to provide this component. A seventh site provided paid work experience as an E&T component,⁸ but only for Food Stamp work registrants also receiving General Assistance. (During the 26-week period of work experience in this site, the GA case was closed because of the participant's earnings on the assigned job.)

Three sites included in the study had unpaid work experience, or workfare, as a requirement of a separate GA work program. Two of these sites had no work experience component within the Food Stamp E&T program; one site had paid work experience as an E&T service option. Depending on the rules of the GA work program and the Food Stamp E&T program, GA/Food Stamp work registrants might be required to participate in one or both work programs. For example, in one site, GA/Food Stamp work registrants were required to participate in unpaid work experience provided by the GA work program until a slot became available in the E&T paid work experience component. Then the client would be enrolled in Food Stamp E&T for a sequence of job search training, job search, and paid work experience. In another site, GA/Food Stamp work registrants actively participating in the GA workfare program were exempt from the E&T program.

Placements into E&T work experience components ranged from 1% to 8% of all E&T placements. In four sites, the local rate of placement into work experience was markedly lower than the statewide rate. This fact suggests

⁸ The funding for the paid work experience component was provided by the local JTPA service system using a special pool of "incentive funds" received by that service area for high performance during the previous JTPA program year.

Table 4-4

FEATURES OF WORK EXPERIENCE COMPONENTS

	Existence of E&T Work Experience	Percentage of All Placements	Paid or Unpaid E&T Work Experience	Existence of Separate GA Work Experience
SITES IN GROUP 1: JOB SEARCH EMPHASIZED				
A	Not offered	--	--	Yes
B	Yes	1	Unpaid	No
C	Not offered	--	--	No
D	Not offered	--	--	No
E	Not offered	--	--	No
F	Not offered	--	--	No
G	Not offered	--	--	Yes
SITES IN GROUP 2: JOB SEARCH TRAINING AND JOB SEARCH EMPHASIZED				
H	Yes	4	Unpaid	No
I	No	--	--	No
J	No	--	--	No
K	Yes	8	Paid	Yes
L	Yes	1	Unpaid	No
SITES IN GROUP 3: EDUCATION AND VOCATIONAL TRAINING EMPHASIZED				
M	Yes	1	Both	No
N	Yes	8	Unpaid	No
O	Yes	3	Unpaid	No

that there was substantial local discretion over the use of the component, even though state policy was influential in determining whether work experience would be available as a component.

Furthermore, several states reported a decline in the emphasis on work experience during FY 90 and FY 91. In one study state, placements into work experience had declined from 83% of all E&T statewide placements during FY 88 to 46% of all placements during FY 90. At the local site visited in that state during FY 91, work experience accounted for only 3% of all E&T placements. One reason for this decline in the use of work experience in E&T was the increasing state policy emphasis on education for Food Stamp work registrants as well as AFDC recipients.

The content of work experience followed a similar pattern across all sites. Clients could be assigned to work experience periods lasting 4 to 6 months in any 12-month period. The number of hours to be worked per month was calculated by dividing the Food Stamp voucher amount by the minimum wage. At one site, work experience job sites were required to contribute \$12.50 per month, or half the participant's transportation allowance.

CWEP work sites included community-based organizations and public agencies. During the period of the work assignment, clients were supervised in carrying out a variety of occupations. Work assignments reviewed as part of this study included custodial work, general office duties, receptionist, and child care worker. In the sample sites, participants chosen for CWEP slots tended to be those with little or no work experience or those who had already completed a job search activity without finding employment. Across all sites, it was rare for an E&T participant to receive a CWEP assignment as his/her first E&T activity. In one site, the CWEP administrator kept a list of potential job assignments and the qualifications required for each position. However, one CWEP provider indicated that CWEP referrals did not always take clients' skill levels and interests into account in matching participants to job assignments.

Although CWEP assignments did not appear to be used in a punitive fashion, E&T staff had varying opinions about the usefulness of the CWEP services. In one site, an E&T staff member said: "The job search workshop does some good, but the work experience is just another dead end that we're running these guys through." In contrast, staff at another site saw some benefit to client participation in CWEP, citing positive factors such as exposure to a work environment, contacts with people who may know about permanent job openings, an increase in self-esteem, and practice in work habits such as grooming and punctuality.

Individual work assignments reviewed at one local site illustrated the variations in the value of the CWEP experience in terms of increasing participant employability, and revealed that job supervisors played an important role in determining whether the CWEP job included training in meaningful occupational skills:

- In one public agency job site, the assigned work consisted of moving file boxes for agency staff. The work was unskilled, participants were not given any training, and it was considered unlikely that they would be hired for a position by the agency. In this job assignment, there was little benefit to the participant in terms of increased employability.
- The job supervisor at another CWEP job site described how she had supervised a participant in a community-based social service organization in general office duties. This client's basic work skills were quite deficient (she appeared to have mental health problems). The CWEP supervisor described how she had worked with the participant on basic hygiene and grooming skills, and indicated that by the end of the 6-month assignment the participant's employability had markedly improved. In this site, the participant gained basic employment skills she had lacked before the CWEP assignment.
- A job supervisor at a third CWEP job site described how he had developed a child care course for participants at his day care center. Training provided to CWEP participants included instruction in early childhood development and basic bookkeeping, as well as practical experience with children. His

goal was to provide participants with the skills necessary to operate home day care centers, for which there was a substantial demand in the area. Although CWEP hours were insufficient to

SUPPORTIVE SERVICES: REIMBURSEMENT OF PARTICIPANT EXPENSES

Table 4-5 summarizes the availability of supportive service reimbursements to E&T participants in the 15 sample sites.

Dependent Care Reimbursements

At the state level, each of the study states had budgeted funds for reimbursement of dependent care costs for FY 91. For the states included in this study, the amounts budgeted at the state level ranged from \$1,000 (less than 1% of the total E&T budget) to \$3.3 million (17% of the total E&T budget). Actual expenditures of dependent care funds varied widely.

As shown in Table 4-5, 12 of the 15 local E&T sample sites offered up to \$160 per month per child for reimbursement of actual dependent care costs during months of active program participation. In the three sites in which dependent care reimbursements were not available, individuals were not required to participate if they needed dependent care. Overall, the local programs found that the need for dependent care reimbursements was low within the Food Stamp E&T population because of the demographic characteristics of this group (i.e., predominantly single individuals).

Reimbursement of Other Participant Expenses

Each of the sample sites reimbursed participants for transportation expenses or other costs incurred during participation in one or more components. The availability of these funds was limited to 1 month of active E&T participation per year in one site and to 2 months of active participation per year in three other sites. (These time periods correspond to the duration of the required E&T service components in these sites.)

Five sites specifically allowed for longer periods of supportive service allowances. One site permitted up to 5 months of transportation reimbursements during active E&T participation, with a further extension possible if approved by the state office. Another site budgeted for up to 7 monthly

Table 4-5

AVAILABILITY OF SUPPORTIVE SERVICES

	Child Care	Transportation	Limitations
SITES IN GROUP 1: JOB SEARCH EMPHASIZED			
A	Up to \$160/month	\$25 allowance approved at completion of each month of job search	Must be used for transportation; available for 2 months/year
B	Up to \$160/month	\$25 allowance	Can be used for transportation, work tools, or tuition
C	Not available; not required to participate if child care needed	\$24 allowance: \$3.00 per day for 8 days per month	Can be used for transportation, work tools if not available from other agencies; available for 2 months/year
D	Up to \$160/month	\$24 allowance distributed at beginning of job search	Up to 5 months of transportation allowance; more on approval of state office
E	Money in budget, but doesn't appear to be used	\$25 allowance paid after completion of each month of participation	Available during job search, job placement, or JTPA
F	Up to \$160/month	Up to \$25 per month	Available only on request in the form of bus tokens or gas money; provided only during job search components
G	Up to \$160/month	Up to \$24 per month	Available in the form of vouchers for gas or public transportation tokens; may also be used to purchase tools or books
SITES IN GROUP 2: JOB SEARCH TRAINING AND JOB SEARCH EMPHASIZED			
H	Not available; not required to participate if child care needed	\$25 per month paid at end of each month of participation	Available in all components; up to seven monthly payments available per person in budget
I	Up to \$160	Up to \$25, approved after completion of job search	Based on number of approved employer contacts; available only 1 month/year
J	Up to \$160/month	\$25 allowance paid at start of job club/job search	Available only 2 months/year; don't require participation unless allowance is received
K	Not available; exemption if child care needed	Up to \$25 reimbursement	Bus passes provided for orientation
L	Up to \$160/month	Up to \$25 allowance	May be used for transportation, glasses, clothes
SITES IN GROUP 3: EDUCATION AND VOCATIONAL TRAINING EMPHASIZED			
M	Actual expenses reimbursed	Services in individual service plans; no caps if costs are reasonable	Available to participants in all components; supportive services may cover transportation, books, tuition, work clothes, tools
N	Up to \$160/month	Actual expenses, at rate of \$0.12 per mile	Expenses in excess of \$25 per month paid out of state funds; available to participants in all components
O	Up to \$160/month	\$25 per month automatically paid during active participation	Available to participants in every component

payments per participant per year. The three sites that emphasized participation in education and vocational training components offered ongoing supportive service payments, as long as the participant was conforming to an approved service plan.

In several sites, the availability of supportive service reimbursements was determined by the service components in which the individual was participating. Although most sites permitted transportation allowances to be provided to participants in any E&T component, several sites specified that supportive services should be paid by another program if funds were available. Thus, in most sites, the JTPA system was expected to cover transportation expenses for E&T participants enrolled in that service system. One site limited the availability of transportation allowances to participants in a job search component. (This was also the effect of the time limitations on transportation allowances in the four sites that limited availability to 1 or 2 months, since these sites all required job search as the initial service component.)

Transportation reimbursements were limited to documented or estimated transportation expenses in four sites. In these sites, transportation expenses were provided in the form of bus passes, gas money, mileage reimbursement, or a lump sum allowance approved and paid after the completion of each month of job search.

Another five sites explicitly used the transportation allowance for a broader range of expenses incurred during program participation, including work tools, tuition, books, glasses, and clothes, in addition to transportation expenses.

In the remaining six sites, transportation reimbursements consisted of a lump sum payment made either at the beginning or end of each month's participation in a program component. In contrast to the other study sites, transportation allowances in these sites were automatically paid to all active participants and came to be looked on as a quid pro quo for participation. Where the transportation payment was made at the beginning of the job search

component, this sometimes became an incentive for participants to enter the component. Respondents in one such site said the program was known to program clients as the "\$24 program."

The level of monthly transportation allowances was set at \$25 in 10 local sites and \$24 in 3 additional sites.⁹ Two sites did not cap the supportive service reimbursements. In one of these sites, actual transportation expenses were reimbursed at the rate of \$0.12 per mile, and \$44 per month was considered a typical level of participant transportation costs in the sample site. In the other site, all reasonable supportive services were specified in an individualized service plan, including transportation, books, tuition, work clothes, and tools, and E&T workers monitored and approved supportive service allowances monthly. In the two sites that did not cap reimbursement of participant costs, costs in excess of \$25 per month were paid out of 100% state funds.

SUMMARY

Job Search Services

Job search/job placement was the predominant E&T service in 7 of the 15 study sites, in which it accounted for 85% or more of all E&T service placements. Five additional sites required job search activities in combination with the provision of job search training. Two sites deemphasized job search activities in favor of education and vocational training components. A final site emphasized job search, but only for the relatively small proportion of E&T work registrants who were assessed as job ready.

⁹ The sites that provided \$24 per month in transportation allowances prorated the allowance at \$1.00 per employer contact and required 24 contacts each month.

In terms of the content of job search services, the sample sites can be divided into two categories: sites in which job search emphasized *procedural requirements* for completing a prescribed number of employer contacts to maintain Food Stamp eligibility, and sites in which job search emphasized *effective job search methods* with a goal of actually securing employment. Eleven of the 15 study sites operated job search components that emphasized procedural requirements. Only 4 of the 15 sites designed their job search components to promote successful outcomes by providing substantial guidance during the job search phase or targeting job search services to job-ready clients.

Job Search Training and Preemployment Training

Some form of preemployment training, job readiness training, or job search training was available to E&T participants in 10 of the 15 study sites. Five sites emphasized the provision of job search training to all E&T participants. In the remaining five sites, job search training was targeted to specific subgroups, such as the most-job-ready or the least-job-ready segment of the work registrant population.

In three sites, job search training workshops were narrowly focused on the mechanics of job search (e.g., developing job leads, making employer contacts, preparing resumes, completing job applications, and conducting job interviews). In the remaining seven sites, job search training/preemployment workshops covered a wider range of topics, including career exploration, labor market information, life skills, and skills related to successful job performance.

Education and Training

Educational and/or vocational training activities were included in the E&T service plans in 13 of the 15 sample sites. While job search and job search training components tended to be designed and operated specifically for Food Stamp E&T participants using E&T program funds, education and vocational services were usually provided through referral to existing local programs using nonfinancial referral linkages.

Specific educational services available through the E&T program usually included adult basic education, GED preparation, and English as a second language (ESL) instruction. Vocational training services usually consisted of referrals to the local JTPA system.

In 10 study sites, these services accounted for only a small proportion of all E&T service placements. Participation in education and training components was limited for several reasons. Since vocational training was often offered as a second component after participation in a required job search, many mandatory E&T work registrants had already found employment, been sanctioned for noncompliance, or left the Food Stamp rolls for other reasons before entering education or training services. In addition, several sites did not actively refer E&T clients to these services. In several other sites, training providers did not often accept E&T referrals because of funding shortages or client screening practices.

In contrast, three sample sites were distinguished by the provision of education or vocational training to a substantial proportion of all E&T participants. These sites emphasized individualized service planning. They also devoted a significant portion of the E&T budget to fund training opportunities for E&T clients and allowances to reimburse participants for expenses incurred while in training. These programs also took advantage of nonfinancial referral linkages to existing educational and vocational training programs. Because each of these sites was part of a large metropolitan area, a wide range of educational and vocational training providers were available.

Work Experience

Unpaid community work experience (CWEP) was an E&T service component in six study sites. One of these sites also offered paid work experience through the Food Stamp E&T program as a 100% state-funded component for Food Stamp work registrants who also received local general assistance benefits. Placements into E&T work experience components accounted for only a small percentage of all E&T service placements, ranging from 1% to 8%. Use of work

experience components appeared to be declining, at least partly in response to the increasing emphasis on education for Food Stamp E&T work registrants.

CWEP work sites included community-based organizations and public agencies. The content of work experience assignments varied in its value for improving client employability: job assignments ranged from unskilled menial tasks to general office help to training in specific occupational skills in demand in the local labor market.

Reimbursement of Participant Expenses

Twelve of the 15 study sites offered up to \$160 per month per child for reimbursement of dependent care costs for participants in E&T services. In three sites where dependent care reimbursements were not available, individuals were exempted from E&T participation if they needed dependent care. Overall, the demand for dependent care reimbursements was low.

All 15 sites reimbursed E&T participants for transportation expenses. Five sites explicitly included other costs incurred by participants (e.g., tuition, books, work clothes, tools) in the supportive services allowances provided to E&T participants. In 13 of the 15 study sites, participant reimbursements for transportation and other costs did not exceed \$25 per month. In the remaining two sites, costs in excess of \$25 per month were paid out of 100% state funds.

Transportation allowances were paid using two different methods. Nine sites limited reimbursements for transportation and other costs to documented or estimated actual costs. In the remaining six sites, transportation allowances were paid as a lump sum either at the beginning of participation in a component or at the completion of a component.

5 CLIENT FLOW AND PARTICIPATION PATTERNS

In this chapter, we describe the steps involved in E&T participation, including (1) work registration of mandatory nonexempt Food Stamp recipients and volunteers; (2) E&T orientation, service assignment, and service sequencing; (3) case management and client tracking practices; and (4) case closure procedures, including procedures for issuing notices of adverse action (NOAAs) for noncompliance and case sanctioning practices. The objective of this chapter is to give the reader a detailed understanding of how a client moves through the system from the point of determination of work registration status to the closure of the E&T case.

CREATING A CLIENT POOL FOR E&T SERVICES

Not all applicants for and recipients of Food Stamps become E&T participants. There are a number of stages in the client flow at which a client may be included in or exempted from the pool of mandatory E&T participants. Clients may be excused from mandatory participation in E&T on the basis of federal or state exemption criteria.

We begin the discussion here with a description of federal criteria for exempting individuals from work registration. Subsequently, some Food Stamp recipients required by federal law to register for work under the E&T program are released from participation under categorical or individual exemptions defined at the state level in the state's approved plan.¹⁰ Most states allow clients who are exempted under those criteria to volunteer for services and thus reenter the client pool for services.

¹⁰ Categorical exemptions were used in 11 of the 15 study states to excuse all work registrants in counties where it was impractical to operate an E&T program because of low numbers of mandatory work registrants or high unemployment rates. Chapter 6 includes a more detailed description of categorical exemption procedures.

Work Registration

The first step in entering the Food Stamp E&T program is work registration. In all sites visited, the determination of Food Stamp E&T work registration status occurred during the Food Stamp application interview with an income maintenance/Food Stamp intake and eligibility worker. The Food Stamp intake and eligibility procedure is often consolidated with intake for an income maintenance program (AFDC or GA). In sites with consolidated intake, intake and eligibility workers determine work registration status for several public assistance work programs simultaneously. For new cases or cases being reopened, work registration was performed at the time of the initial intake/eligibility interview. Individuals receiving Food Stamps on a continuing basis were registered for work at the time of Food Stamp eligibility redeterminations (which must occur at least once a year).

For the Food Stamp program, the initial step in determining whether an individual was a work registrant involved applying the federal exemption criteria. These criteria exempt from mandatory work registration individuals under 18 or over 60 years of age¹¹; individuals needed in the home as a caretaker for children under 6 years of age or a dependent family member; individuals enrolled in school at least half time; UI recipients in compliance with UI work requirements; individuals employed and earning at least 30 times the federal minimum hourly wage per week; and AFDC recipients who are subject to or complying with work requirements for the JOBS program.¹²

¹¹ Individuals receiving Food Stamps who are 16 or 17 years old must also register if they are heads of households, not in school, and not otherwise exempt.

¹² As described in Chapter 3, study states varied in the percentage of Food Stamp recipients who also received AFDC benefits. Thus, in some states, over 80% of all Food Stamp recipients were exempted from Food Stamp work registration because they were AFDC recipients subject to JOBS participation. In other states, the non-public assistance (NPA) Food Stamp caseload was a much higher proportion of all Food Stamp recipients; these states tended to have larger Food Stamp work registrant pools.

Staff at one site mentioned that it was difficult for eligibility workers to identify accurately all cases qualifying for federal Food Stamp work registration exemptions because they were unable to spend sufficient time on this topic during the initial intake interview. E&T workers at this site referred clients back to eligibility workers for a redetermination when they appeared to have referred an individual eligible for a federal exemption.

In the 12 sites that permitted individuals to volunteer for the E&T program, the intake and eligibility worker was also responsible for informing individuals not subject to mandatory work registration about the opportunity to volunteer for E&T services.

Individual Exemption Procedures

The second step in entering the Food Stamp E&T program was the application of individual exemption criteria established by the particular state and approved by FNS. Individual state exemptions were implemented by income maintenance workers in eight study sites. At the other seven sites, individual exemptions were applied after referral to E&T.

A number of criteria were used for individual exemptions across study sites. Those most commonly used included lack of transportation (9 sites), geographic remoteness (8 sites), lack of child care (8 sites), physical or mental disabilities (7 sites), job-attached individuals (variously defined in 10 sites), women in their second or third trimester of pregnancy (5 sites), seasonal and migrant workers (4 sites), and language barriers (4 sites). Other individual exemption criteria included legal problems, homelessness, family difficulties, and transitional living situations. In one site, individuals receiving General Assistance benefits were also exempted from Food Stamp E&T participation requirements, as long as they were actively participating in the state's GA work program. In another site, the state had recently added an individual exemption for clients who had not completed eighth grade and had not worked full-time for more than 6 of the 12 months preceding the eligibility interview.

States varied in the number of individual exemption criteria used. For example, several states used only four criteria for individual exemptions while another state used eight. The percentage of E&T work registrants granted individual exemptions in each state also varied greatly, from less than 1% to 24%. (The percentage of work registrants exempted using categorical and individual exemptions in each site is displayed in Table 6-3 in Chapter 6.) Even with identical exemption categories, sites interpreted the criteria differently; consequently, the percentage of E&T work registrants granted individual exemptions varied. For example, at one site a client who lived more than an hour away from an E&T office did not receive an individual exemption even though geographic remoteness was included as a criterion. At other sites, the geographic remoteness criterion was interpreted more liberally and applied to all clients who lived in remote areas or had problems with transportation.

Another procedural variation included the frequency of monitoring individual exemption status. One site monitored individuals exempted for job attachment and pregnancy every 60 days to check for a change in status as required by federal regulations. However, individuals exempted for transportation and language barriers at that site were exempted until recertification. Other sites approved individual exemptions until recertification.

In some sites, E&T staff were given discretion to grant temporary deferrals to individuals with barriers to E&T participation who did not qualify for formal exemptions. Three sites allowed temporary deferrals from the E&T program if participation in the program was feasible within 30 days. Beyond 30 days, a formal exemption and deregistration of the E&T case was required. A fourth site used temporary deferrals (rather than individual exemptions) for geographic remoteness, medical and child care problems, lack of transportation, and second and third trimester pregnancy. This meant that the E&T case remained open pending a change in deferral status.

After determination of work registration status and application of individual exemption criteria, the remaining mandatory nonexempt work registrants were subject to E&T work program participation requirements as

implemented in the particular E&T site. Twelve of the 15 sites visited required active participation of all mandatory nonexempt work registrants in their jurisdiction. The remaining three sites targeted specific subgroups within the mandatory nonexempt work registrant population. (See Chapter 6 for a more complete description of client targeting procedures.)

Referral to the E&T Program

After determining mandatory work registration status, eligibility workers referred the client to the E&T service unit or service contractor. In 12 sites, referral involved sending information about the client to the E&T service provider. This referral information was automated in 2 sites and involved hard-copy forms in 10 sites. In contrast, in 3 sites, referral involved hand delivery of information directly to the E&T service provider by the client or the eligibility worker making the referral. This practice expedited enrollment in the E&T program.

ORIENTATION, ASSESSMENT, AND ASSIGNMENT TO SERVICES

In most sites, orientation, assessment, and service planning were not considered separate E&T service components. Rather, they were part of the process of E&T intake and enrollment. One study state received FNS approval of employability development planning (EDP) sessions as a separate service component required of all participants, after providing evidence that a significant level of participant effort was required. Another study site included assessment as a service component available by referral to the JTPA system, but used this component only infrequently.

Orientation

Once a referral had been made to E&T, staff within the E&T unit were responsible for setting up appointments with clients for orientation. With the exception of the three sites where clients were directly referred from the eligibility/benefits unit to E&T, clients were notified in writing of the E&T participation requirements and requested to attend an orientation

session. These letters typically provided brief descriptions of the purpose of the orientations and emphasized that failure to attend could result in sanctioning for mandatory nonexempt work registrants. Orientation sessions were typically scheduled 1 to 4 weeks after a referral to E&T. The longest estimated time between referral to E&T and a scheduled intake session, 45 days, occurred at a site that provided individual orientation and EDP sessions.

Staff reported that the client response to appointment letters for orientation was generally very poor and a source of frustration. Staff at most study sites reported no-show rates of 35% to 60%. Failure to attend orientation to E&T was perceived by staff to be the most common source of noncompliance. Noncompliance and the sanctioning process are discussed in greater detail later in this chapter.

The purpose of orientation was to inform clients about the E&T program and the procedural requirements for participation. During orientation, clients typically were informed about their responsibilities for participation, the consequences of noncompliance, and the availability of supportive services. Orientation was also used to screen for individual exemptions where this had not occurred previously. In sites where multiple service components were available, clients were informed about the available options. In some sites, clients were provided an immediate choice among available service components. At other sites, client choice among service options was made available only after completion of a required job search. Service sequencing is discussed in more detail later in this chapter.

Group orientations were a program feature designed to deal with large numbers of clients moving through E&T in sites that targeted all mandatory nonexempt work registrants. Nine programs provided group orientations under most circumstances, while six programs provided individual orientations most frequently. All programs scheduled individual orientation appointments if a client missed a group session or for special categories of clients who were hard to reach in advance, like the homeless. Group orientations observed during site visits lasted 45 minutes to 2 hours. Individual orientation

sessions observed lasted between 2 minutes and 45 minutes. The longer individual sessions involved more intensive employability development planning as well as orientation and are described in more detail under "Service Assignment/Employability Development Planning" below. One site had changed from providing group orientations to individual orientations during FY 91 because staff felt that clients' confidentiality was compromised in group orientation and service assignment sessions. However, a consequence of the change was a client backlog. In sites that targeted all mandatory nonexempt work registrants, the size of the client pool was a factor that made individual orientation and EDP sessions difficult to implement.

Eligibility/benefits workers were responsible for some functions of orientation in five sites. In three sites, they were responsible for explaining rights and responsibilities to clients and/or reviewing the E&T program goals and objectives. In the other two sites, the eligibility/benefits workers were also responsible for administering a preliminary assessment that documented work history, education, and prior participation

in E&T. On the basis of these informal assessments, eligibility/benefits workers assigned clients to a specific E&T component or provider.

Not all sites provided a formal orientation. In four sites, the orientation session functioned as the introductory session of a job search training/job club component. At these sites, clients who were interested in or encouraged to participate in another component, such as education, were identified during orientation and placed in that component. In an additional seven sites, individual job search was the required first component for the majority of participants. In those sites, the orientation session provided the opportunity for E&T staff to explain the job search participation requirements.

Three sites operated distinct orientation sessions based on client characteristics. In one site, first-time participants attended an orientation that segued into a job search training component, while repeat participants attended an orientation for individual job search. A second site offered large group orientations for repeat participants and smaller group

orientations for those without a work history/employment application on file so that individual attention could be provided. In a third site, the E&T program was partly consolidated with the JOBS program for AFDC recipients. However, because participation requirements and the level of supportive services available were slightly different for the two groups (JOBS provided more supportive services), separate group orientations were held for E&T and JOBS participants. Participants in this site then went on to individual meetings with an E&T worker for service assignment.

Assessment

Formal assessments were administered in three sites to all participants before the development of an E&T service plan. An additional six sites had formal assessments available to participants with limited education and to those placed in specific components. Six sites informally documented educational level and work history or did not assess clients' skills or educational level.

Formal Assessment for All Participants

Formal assessments using either the Test of Adult Basic Education (TABE) or Comprehensive Adult Student Assessment System (CASAS) were administered immediately after the group orientation in three sites. In two of the sites, assessment results were an important consideration in service assignment. Clients in these sites were scheduled for individual sessions with a case manager after assessment so that the results could be used during the service assignment/employability development planning session. In the third site that provided a universal formal assessment, the results were not used in individualized service planning. In this site, the purpose of the assessment was to identify clients deficient in basic skills in order to refer these clients for remediation before they participated in a job search component. The problem with this process was that the referral linkage to the basic education provider (JTPA) was not well developed, and few E&T clients actually entered basic education services. The low rate of placements into JTPA in this site indicated that the assessment was a formality rather than

an effective tool to match clients to services to address basic skill deficiencies.

Sites with formal assessment procedures tended to offer more intensive job search assistance, job search training, or education and training services to E&T participants. However, as described above, not all sites with formal assessment procedures used this information to make individualized service assignments.

Formal Assessment Available to Participants in Selected Components

Two of the six sites provided formal assessments as part of the employability development process to selected clients who appeared to be deficient in basic skills as determined through informal individual assessments by the E&T case manager. Both sites operated programs that used outside service providers for most E&T services, including assessment. At these sites, assessment was encouraged for clients who appeared deficient in basic skills but was also available to participants specifically requesting career assessments, for example. In three sites, formal assessment was available only to clients assigned to the education component. In these three sites, however, assessment was a feature of the service providers' program rather than the E&T program and had no impact on service assignment. At the sixth site, a formal assessment of occupational aptitudes was administered to all clients referred to the Employment Service, using the General Aptitude Test Battery (GATB). The purpose of this assessment was to assist prospective employers rather than to address clients' basic skills deficiencies. In this site, large employers would typically request referrals of individuals with the 100 best scores.

Informal Documentation of Client Self-Assessment/No Assessment

Six of the 15 study sites did not assess participants' educational deficiencies or other employment barriers. The emphasis of these E&T programs was on immediate job search and placement. Consequently, when educational and skill levels were documented, the purpose was to match

clients' skill levels with potential jobs (or, in one case, to exempt clients without an eighth-grade education and no recent work experience). Sites in this category asked clients to document their work history, formal education, and occupational skills, either in individual meetings with staff or through written program applications. These informal assessments were not designed to identify basic skills deficiencies or develop individual service plans.

For at least two of these six sites, staff documentation of work history and skills was limited to whether a client had ever worked. The documentation was conducted for procedural reasons, not to provide the client with any insight into employment goals, assist staff in suggesting appropriate job leads, or aid in the development of individualized service assignments.

Service Assignment/Employability Development Planning

In the next step in the E&T service process, clients were matched to an initial E&T service component. Assignment into an E&T service component was individualized in four sites. In seven sites, some service alternatives were offered at the initial service assignment. Four sites had standardized service assignments for all participants.

Individualized Service Assignment

The four sites that provided individualized employability development planning sessions focused on motivating clients to succeed in service participation and eventually become employed. These programs emphasized assistance to clients rather than participation compliance. Clients receiving services in these sites had the widest range of choices available in selecting service components. Sites making individualized service assignments were more likely to emphasize the use of education and vocational training service components and to design job search training oriented to less-job-ready clients.

How these four sites were able to accommodate clients' individual career plans is best illustrated by an example from a site where employability

development planning was provided as a separate component. A client arrived at the EDP session with information regarding a course offering training to obtain a roofing license. The E&T worker interviewed the client extensively about his experience in roofing work and the availability of work in this field. It was determined that the major barrier to the client's employment in roofing was the lack of a license. Although the course was not offered by an E&T contractor, the E&T worker was able to approve an individual training referral, using funds available to accommodate such specific requests. In addition to verifying the course requirements, the E&T worker added a "fall-back" plan to the EDP in case the roofing course did not result in the client's employment. The second plan, if implemented, would require the participant to secure his GED (something that the E&T worker actively encouraged the participant to do in any case as a defense against future unemployment). The worker also encouraged the client to take advantage of the education and career assessment facilities available through nonfinancial linkages.

Two of the four sites were able to provide individualized employability development/service assignment because these sites did not attempt to serve all members of the mandatory nonexempt work population, but rather a targeted subset of that group. The other two sites practiced a judicious combination of group and individual service planning sessions to maximize staff resources. For example, at one of these sites, eligibility/benefits workers conducted the preliminary orientation/assessment that referred participants to either work experience or a case manager for job search or education and vocational training assignments. Participants signed up for individual service assignment sessions after attending group orientation and assessment. The second site followed a similar process: a group orientation followed by a group-administered CASAS test, followed by a 30- to 60-minute individual session for service assignment with a program specialist.

Two sites in this category required active clients to complete multiple service components. The service sequencing at these sites was designed to address employability deficiencies first, followed by job search and job placement activities. Participants would be placed directly into job search

activities only if it was determined at the service assignment session that their current education and skill levels were sufficient for them to find immediate employment at or above the minimum wage. One site imposed the additional requirement that all GA recipients between the ages of 19 and 40 participate in an education component. In addition, any E&T participant reading below the fifth-grade level was required to receive literacy training.

At the third site, participation in one E&T component was required. Participation in further components was encouraged but not required if the participant still lacked employment skills. At the fourth site, participants were selected on the basis of whether they initiated contact with the E&T program after receiving information about the services available through the program.

Staff at sites that offered individual service assignments also emphasized ongoing monitoring of participants' progress. One site divided the case management function between staff who monitored participants in education or training and staff who monitored those in job search. This division was made because the education and training components lasted longer and no E&T funds were available to allow education agencies to assist in tracking client progress. At the other three sites, monitoring of the participants' progress was fairly intensive. Staff providing job search services in-house were often in weekly contact with participants. Those in education and training components were monitored at least once a semester to track attendance and grade reports. Participants were scheduled for reassessment for additional services when a component was completed.

Sites with Service Alternatives for Some E&T Participants

The seven sites in this category placed the majority of their participants into a job search or job search training activity as their initial E&T activity. However, each of these sites also allowed participants requesting an education or training activity to enter that component before, or instead of, job search/job search training. Service assignment occurred in

individual sessions with E&T staff at two of the sites and in group sessions at the other five. At one of these seven sites, 15% of all service placements were made to the education component, which could be selected as the first component instead of job search training. Participants at that site also were allowed to choose between job search or referral to JTPA for their second service component. Two of the sites had a policy of encouraging participants without a GED to enter a basic education or GED component, but less than 5% of their placements were in that component. In the remaining sites, education and training components were rarely used.

Sites in this group gave clients some choice over E&T service assignments. In some instances, they allowed clients to address basic education and skill deficiencies either before completing a job search or as their only required participation in E&T. However, the majority of clients in these sites were considered job ready and entered the job search/job club component.

Four sites in this category required participants to complete only one component per year. One site required a job search component and allowed participants to complete a second component. The two remaining sites required participation in at least two program components per year.

Sites with One Component or a Standardized Service Sequence

In the four sites in this category, all participants were required to complete an initial job search. In two of these sites, the service assignment occurred as part of the orientation session. At the other two sites, participants met individually with E&T staff after attending a group orientation.

The service sequencing for sites in this category required completion of an initial job search activity before assignment to another component. In one site, the job search was the only required E&T activity each year. In another site, Food Stamp eligibility redetermination was required every 6 months, and participation in E&T job search was also required of mandatory

nonexempt work registrants every 6 months. Participants at that site could request participation in an educational component after completion of job search, but this was not actively encouraged at the observed reassessment session. A third site required all participants to complete a job search training component, followed by job search. GA recipients who remained unemployed were then assigned to paid work experience as a third E&T component. At the fourth site, there was a requirement for continuous participation in E&T. As participants completed one component, they would be reassessed and assigned to another component.

Sites in this category were characterized by informal assessment of client employability, followed by limited client choice of services. To reap any benefit from these programs in terms of improved employability, participants had to be self-motivated and initiate requests for specific services such as education or vocational training. This was in contrast to the sites where clients were offered more choice in service assignment and where there was a greater emphasis on employability development.

Factors That Influenced the Quality of Orientation, Assessment, and Assignment to Services

In addition to the overall E&T funding limitations, the constraints to providing more intensive services in E&T orientation, assessment, and service planning included limited staff time and training, and program philosophy.

Estimated E&T staff caseloads ranged from 150 to 400 per case worker. Programs with caseloads in the 150 to 200 range were in a better position to offer individualized service planning. However, some programs with larger caseloads still managed to do this by using a combination of group and individual sessions and more effectively using available resources.

Staff training and program philosophy influenced the extent to which available local resources were used in service sequencing. Staff at sites with a program philosophy that emphasized immediate employment of job-ready clients were less likely to encourage participants to use resources not directly provided by E&T, such as education and career assessment.

CASE TRACKING AND MONITORING PROCEDURES

Study sites varied in the procedures used to track individual E&T cases and in the objectives of case tracking and case management practices. Most sites tracked participants for the purpose of reporting service placements and monitoring compliance with participation requirements. A few sites also used ongoing case management contacts to assist clients in reaching individual employability goals. Few, if any, sites tracked participant progress beyond the required E&T activities to document employment outcomes achieved as a result of E&T participation. In each study site, a designated E&T program unit had the responsibility for assigning clients to services and monitoring participation. As described in Chapter 4, this unit was located in the public assistance agency in 10 study sites and was operated by an outside contractor in 5 sites.

When services were operated directly by the E&T program unit, client tracking was relatively straightforward. For example, in most sites, service placements for job search and job search training were recorded as of the date of the first service contact (e.g., a group orientation/intake session or an individual interview with an E&T case worker). After documenting attendance at an initial service session and any subsequent group job search training sessions, E&T staff continued to track participant progress through periodic face-to-face follow-up appointments. Participants were required to bring documentation of completed employer contacts to these follow-up sessions. In most study sites, E&T staff reviewed these employer logs to see whether the reported employer contacts were plausible, but did not verify the contacts. In several sites, case workers called a small sample of employers to verify that the reported contacts had been made. To be in compliance with participation requirements, a client was required to attend the scheduled follow-up session and provide adequate documentation of completion of the required job search contacts.

Where E&T services were provided by an agency other than the agency in which the E&T program unit was located, participant tracking was more problematic. If formal financial service contracts were used, the contracted

service provider generally was responsible for submitting regular written attendance reports to the E&T program unit or contacting the E&T case worker if individual clients stopped attending classes or failed to fulfill participation requirements. Case tracking of enrollment and continued progress in services provided through nonfinancial service linkages was especially difficult.

Nevertheless, in five sites, case tracking procedures followed clients through participation in all service components. For example, one site required E&T case workers to follow up on client progress monthly, even for clients enrolled in education or vocational training programs through nonfinancial referrals to existing local community programs. Another site required E&T case workers to document the progress of participants assigned to education components at least every 5 months, or at the close of the school semester. In a third site, a special set of E&T case managers monitored the progress of clients enrolled in community education or training institutions for basic education or vocational training. In two other sites that assisted participants in developing individualized employability development plans, regular case management contacts were used to monitor participant progress and assess the need for additional services.

In contrast, tracking of service placements and ongoing participation in services provided through nonfinancial coordination linkages was less extensive in six sites. In these sites, E&T case workers generally did not monitor clients referred to outside service providers for vocational or educational service components beyond the initial referral and enrollment in services. In one site where JTPA registration lists were provided by the JTPA system, the E&T case worker was reluctant to request sanctions for clients not on the lists because he had found these lists to be inaccurate in the past. In two of the six sites, the state had decided to track and report JTPA referrals through after-the-fact "data tape matches" rather than client-level monitoring. Thus, in these sites, computerized records of JTPA participants and Food Stamp work registrants were compared, and matches (Food Stamp work registrants participating in JTPA) were reported as E&T service placements, whether or not the JTPA enrollment resulted from an E&T service referral.

Several sites mentioned that tracking case closure status was difficult if participants found employment or were sanctioned. In one site, the E&T staff were informed if the Food Stamp case was closed, but were not told whether the closure was due to employment or sanctioning. This made it difficult for E&T staff to track employment outcomes or to measure the impact of their program.

SANCTIONING PROCEDURES AND PRACTICES

E&T case workers were generally responsible for tracking client participation in required service components and submitting reports of noncompliance to Food Stamp eligibility/benefits workers. In 14 of the 15 study sites, the Food Stamp eligibility/benefits workers were responsible for sending out notices of adverse action (NOAAs) in response to reported noncompliance, holding fair hearings to determine whether there was good cause for the noncompliance, and implementing sanctions. In the 15th site, the E&T case worker was responsible for sending out NOAAs and implementing sanctions directly for failure to comply with Food Stamp E&T participation requirements.

The most frequent type of noncompliance with E&T requirements was failure to follow up on the referral to the E&T program. In sites where the Food Stamp eligibility worker referred work registrants directly to the E&T unit for services, failure to contact the E&T unit as directed constituted noncompliance. In sites where the E&T unit sent out letters to mandatory work registrants specifying an appointment date and time or requesting them to call for an appointment, failure to follow up on the E&T letter constituted noncompliance.

In 13 of the 15 study sites, clients were given two chances to respond to the E&T referral before the E&T case worker reported noncompliance to the Food Stamp eligibility worker. However, one site issued a notice of probation after the first instance of noncompliance with a warning that a notice of adverse action would follow the second offense. Of the remaining two sites, one had received permission from the state to report noncompliance and

issue NOAAs after one missed appointment. The other site had defined non-compliance as a more serious infringement of program requirements. For example, participants had to be actively refusing to participate or causing problems for other participants before they would be considered noncompliant in this site.

Initial failure by referred work registrants to respond to letters calling for attendance at E&T orientation/intake sessions was widespread across the study sites. Initial no-show rates ranging from 35% to 60% were not uncommon. This resulted in a substantial paperwork burden for E&T case workers, who had to issue second written notices to a high percentage of all clients and report noncompliant work registrants to the Food Stamp eligibility unit. The rate of initial noncompliance was negligible only in two sites that encouraged motivated work registrants and selected target groups to initiate requests for E&T services rather than requiring all work registrants to participate.

Subsequent actions that could lead to reports of noncompliance included failure by mandatory clients enrolled in job search training to attend all required job search training sessions; failure by those enrolled in a job search component to attend required interviews with an E&T case worker or to document completion of the required number of employer contacts; and failure to enroll in or attend work experience, education, or training components after a mandatory referral to these services. In several sites, if individuals selected an education or training component but failed to follow through on this component, they were called in for mandatory job search or work experience before being referred for sanctions.

As soon as the noncompliance was documented, E&T workers in some study sites closed the E&T case and terminated supportive service payments to the client. After issuance of a notice of adverse action, expiration of a 10-day waiting period and/or client failure to establish good cause through a fair hearing process, the Food Stamp eligibility unit imposed a 2-month sanction on the entire household (if the head of household was noncompliant) or the individual Food Stamp recipient (if another household member was noncompliant), as required by federal law.

Perhaps the most controversial aspect of the Food Stamp E&T sanctioning process was the procedure for curing sanctions after they were applied. As required by federal law, all study sites allowed E&T clients to cure sanctions during the 2-month period of disqualification by indicating a willingness to comply with program requirements and commencing a required activity. The requirements to cure a sanction were rather easy to meet in most of the study sites. Thus, if an individual failed to attend an orientation/intake session, attendance at such a session was required to cure the sanction. If an individual failed to complete job search training, attendance at training was required to cure the sanction. For components operated by outside service providers, sanctions could generally be cured by actively participating in services as planned in the EDP. Only two sites imposed more significant tests of willingness to comply, one by requiring successful completion of a 5-day work assignment of at least 20 hours to cure a sanction, and one by requiring successful completion of a work activity lasting up to 2 weeks.

In a number of the study sites in states with a high volume of NOAAs compared with service starts, E&T staff had substantial concerns about the sanctioning process and felt that it was "taking over" the E&T program. One major concern was the amount of E&T staff time consumed in documenting non-compliance and requesting sanctions. In a number of sites, staff indicated that they spent at least half their time completing the paperwork involved in reporting noncompliance or curing sanctions once implemented.

A second concern expressed by E&T staff was the lack of substance to the sanctions, since they could be easily cured. Many staff perceived the time they spent documenting noncompliance as wasted time, because clients could cure sanctions with little effort. Staff perceived that clients could abuse the system by curing a sanction and then waiting until the sanctioning process was initiated once again. There was a common perception that clients who learned how to manipulate the system could avoid participation in E&T without the loss of their Food Stamp benefits.

A third concern expressed by program administrators concerned the lack of consistency between the sanctioning procedures required for noncompliance in the JOBS program and the Food Stamp E&T program.

CLOSING E&T CASES

E&T programs in some of the study sites closed individual E&T cases as soon as the participant completed his or her annual participation requirements. Other sites delayed closing E&T cases until informed by the eligibility/benefits worker that the participant was employed and/or that the Food Stamp benefits case was closed. For example, if a participant notified the E&T or provider staff that he or she was employed, E&T staff in these sites requested verification from the cash assistance units that the participant's benefits case was closed or that the individual was now eligible for an exemption from E&T participation.

In most sites, E&T cases were not closed in response to noncompliance or sanctioning, because of the frequency with which individuals cured their sanctions. In one site, however, E&T staff closed the E&T case immediately in response to noncompliance and stopped providing supportive service payments to that client until the participant demonstrated a willingness to comply.

PARTICIPATION PATTERNS

Participation in E&T services varied across the study sites in the volume of participants being served, the ratio of service placements to mandatory nonexempt work registrants, the rate of participation by volunteers, and the volume of NOAAs issued.

The annual volumes of E&T service placements in the 15 local study sites were under 1,000 participants per year in five sites, 1,000 to 3,000 partici-

long as they were participating in the state's GA work program. The remaining site served new Food Stamp cases but not cases recertifying eligibility. The high-volume sites were located in counties with moderate to high urbanization. Two of the sites had multiple service offices and large staffs devoted to serving E&T clients. In addition, the high-volume sites used service contracts and nonfinancial linkages for the provision of most E&T service components. The third site had only one intake office with seven staff. That program offered less-intensive services and required participation in only one component.

Table 5-1 summarizes the number of E&T service placements as a percentage of the mandatory nonexempt work registrant population across the study states, as well as the extent of participation by volunteers. As shown in the table, the proportion of E&T service placements as a percentage of mandatory nonexempt work registrants ranged from 16% to 114% for the states visited. (Corresponding figures for the local study sites were not available.) States with low levels of service placements were characterized by program designs that targeted subgroups within the mandatory nonexempt work registrant population and/or high rates of NOAAs (over 30% of mandated starts). Although the three states with the highest proportions of service placements had program designs that required participation in multiple service components, this did not seem to influence the proportion of service placements made. Two of the three states with the lowest proportions of service placements also required participation in multiple components.

Three states did not allow participation by volunteers. In six states, participation by volunteers represented less than 1% of all service placements. Four states ranged from 1% to 10% of service placements for volunteers. Two states reported serving volunteers more extensively, accounting for 25% and 35% of all service placements. However, it should be noted that in these two states, volunteers did not generally receive the full range of E&T services. In fact, many of the reported volunteer placements in these states occurred through after-the-fact data tape matches with JTPA participant data. In the remaining states, volunteers participated in E&T services

Table 5-1

**E&T PARTICIPATION PATTERNS
(State-Level Data for FY 91)**

	Service Placements as a Proportion of Mandatory Nonexempt Work Registrants	Volunteers as a Proportion of Total Service Placements	NOAAs as a Proportion of Mandatory Nonexempt Work Registrants	NOAAs as a Proportion of Mandatory Service Placements
State A	30%	10%	14%	46%
State M	40%	< 1%	2%	5%
State O	26%	0%	15%	58%
State N	36%	1%	3%	8%
State G	58%	< 1%	10%	16%
State F	96%	1%	42%	44%
State K	114%	< 1%	31%	27%
State C	46%	2%	8%	16%
State H	16%	< 1%	13%	83%
State D	35%	25%	26%	74%
State B	66%	0%	3%	49%
State E	45%	< 1%	17%	37%
State I	42%	< 1%	21%	50%
State L	32%	0%	16%	50%
State J	42%	35%	34%	82%

through the regular client flow process but were not subject to sanctions for failure to complete assigned services.

Table 5-1 also summarizes the frequency of notices of adverse action (NOAAs) issued by each of the study states during FY 91 (these data were generally not available at the county level). Column 3 of Table 5-1 presents the number of NOAAs as a percentage of the total number of mandatory non-exempt work registrants. Column 4 presents the number of NOAAs compared with the number of mandatory service placements. As shown in the table, the number of NOAAs issued in FY 91 ranged from 2% to 42% of mandatory nonexempt work registrants and totaled 5% to 83% of all service placements. In four of the study states, the total number of NOAAs issued was relatively small compared with the number of service placements (less than 20%). However, in six states, the total number of NOAAs issued amounted to 50% or more of the total number of service placements.

SUMMARY

Client flow into the Food Stamp E&T program was initiated with work registration, performed by staff in the income maintenance/Food Stamp eligibility and intake unit. A number of individuals are exempted from Food Stamp work registration by the federal exemption criteria. Among other groups, the federal legislation exempts AFDC recipients who are in compliance with the JOBS participation requirements. Especially in states where high percentages of the Food Stamp recipient population were AFDC recipients subject to JOBS participation, the federal exemptions eliminated a significant number of Food Stamp recipients from the Food Stamp E&T work registrant pool.

The second step in entering the E&T program is the application of categorical and individual exemption criteria. Categorical exemptions, which were applied in 11 of the 15 study states, resulted in the exclusion of 3% to 65% of the work registrant pool from E&T participation requirements through the elimination of counties with low volumes of work registrants and/or high unemployment rates. Individual exemptions further eliminated from 1% to 24%

of work registrants in the study states for reasons such as lack of transportation, geographic remoteness, job attachment, pregnancy, and other barriers to participation. In addition, some sites permitted E&T staff to grant temporary deferrals to individuals who did not qualify for formal exemptions.

After the identification of mandatory nonexempt work registrant status, individuals were referred to the E&T program. Attendance at an orientation session was the first required program activity in most sites. Group orientations were provided in sites with large numbers of E&T participants; sites with more individualized service planning provided individual orientation sessions or a combination of group orientations and individual service planning sessions. Not all sites provided a formal orientation. Especially if one service was first required of all E&T participants (e.g., job search training or job search), the initial meeting was considered the beginning of participation in this service component.

Formal assessments of basic skills and occupational aptitudes were conducted for all E&T participants in only 3 of the 15 sites. Two sites used formal assessments to guide individualized service planning. In the third site, the objective of assessment was to identify individuals with basic skills deficiencies for referral to educational services. Additional sites provided formal assessments only to participants assigned to specific service components.

Four of the 15 study sites developed individualized service assignments for E&T participants. These programs emphasized how services could help clients become employed, rather than how the client had to comply with program requirements. Seven sites placed the majority of participants into job search or job search training as their initial E&T service assignment, but allowed participants the option to select education or training instead of job search/job search training. In six of the sites, however, education and training components were rarely used. Four sites had a standardized service sequence, which required completion of an individual job search before assignment to another component. In two of the sites, education or

vocational training was available for participants who requested these services, but only after the completion of job search.

Client progress was tracked primarily to report service placements and monitor compliance with E&T participation requirements. Client tracking was relatively straightforward when services were operated directly by the E&T program unit. Where E&T services were provided by another agency, participant tracking was more problematic. In some sites, case tracking procedures were extensive; in other sites, clients were not tracked beyond referral and enrollment once a referral was made to an outside service provider.

For noncompliance with E&T participation requirements, E&T workers notified Food Stamp eligibility workers, who were responsible for issuing notices of adverse action and initiating sanctions. Initial failure to attend E&T orientation/intake sessions was widespread across the study sites, with no-show rates of 35% to 60% in many sites. As required by federal regulations, all study sites allowed E&T clients to cure sanctions during the 2-month period of disqualification by demonstrating a willingness to comply with program requirements. The requirements to cure a sanction tended to be rather easy to meet in most sites. As a result of the high rate of non-compliance and the frequency of cures, E&T staff tended to spend a high percentage of their time completing the paperwork associated with reporting noncompliance or curing sanctions.

6 E&T PROGRAM DESIGN DECISIONS

This chapter describes the design decisions made by state and local policymakers responsible for E&T design, operation, and oversight. Key design decisions include: (1) what services are provided to E&T participants; (2) what groups are targeted for E&T services; (3) how service delivery is organized; (4) whether the delivery of Food Stamp E&T services is consolidated with work programs for other public assistance clients; and (5) to what extent service coordination linkages are used to expand the services available to E&T participants. The chapter also discusses how E&T design decisions were shaped by the mix of state and local policy roles, the level of funding provided for E&T programs and supportive services, and state and local administrators' understandings of E&T program goals and objectives. A final section describes how state and local E&T design decisions are related and how they were influenced by a variety of other factors.

STATE VERSUS LOCAL ROLES IN E&T PROGRAM DESIGN

The study sites varied according to whether the decisions that shaped local E&T service designs and operations were made primarily at the state level or at the local agency level, or were shared by state and local policymakers.

In most of the 15 case study sites, states played the dominant role in E&T program design. In both state-administered and locally administered sites, staff in the state agencies administering or overseeing the Food Stamp E&T program determined what service components would be available to E&T participants, how to distribute the statewide E&T budget among local sites, and what groups of mandatory work registrants to target for services. States also set statewide policies for reporting noncompliance and issuing sanctions in all case study sites.

State policymakers were usually influential in the design and sequencing of E&T services, as well. Two exceptions were notable. One exception occurred in a county-administered system in which the state provided few guidelines regarding the selection and sequencing of E&T services, giving the county welfare agency the autonomy to design and develop its own local E&T program. Another exception occurred in a county-administered system in which the state lacked the political muscle to influence local design decisions. The local site visited in this state viewed the E&T program as a very low priority and did the absolute minimum necessary to meet the state's E&T requirements.

Whereas state policymakers were often influential in determining the content and service delivery arrangements for E&T services funded directly from the E&T budget, local policymakers usually were responsible for developing nonfinancial referral linkages to existing local programs for the delivery of education and vocational training services to E&T participants.

Design Decisions in State-Administered Systems

Not surprisingly, state policymakers were most involved in planning and overseeing the details of E&T program design and operation in the nine state-administered sites. In six of the nine state-administered sites, state policymakers determined how E&T services would be provided (e.g., whether they would be provided directly by welfare agency staff or contracted out to another agency). State-level staff in these sites also determined how work registrants would be assigned to different service components, which services were required, the emphasis to be placed on different services, and how services would be sequenced for those participating in more than one E&T component. Where the provision of E&T services was contracted out to other agencies in these six sites, service providers were selected by state staff and contracts were negotiated and monitored at the state level.

For example, in one state-administered site with a strong state design role, state policymakers decided to operate the funded E&T components directly with welfare agency staff. State policy required that mandatory

nonexempt work registrants participate in two E&T components each year: first, a job search training component consisting of 6 hours of group training followed by 25 job contacts with employers over a 1-month period; second, either vocational training provided by the JTPA system or workfare operated by the welfare agency. This state also had a policy requiring local sites to encourage mandatory work registrants lacking a high school diploma or GED to participate in Adult Basic Education (ABE) or GED preparation classes either before or immediately following the job search training component. There was little local discretion in the details of E&T design or operation in this site.

In three of the nine state-administered systems, local decision-makers were given substantially greater discretion over the design and delivery of local E&T services. In two local sites, the county or district welfare administrators were permitted to decide whether to offer E&T services in-house or to contract for E&T services with another agency or program. In all three sites, county decision-makers were able to determine how to match clients to services, how to sequence E&T services, and what to include in the content of specific service components (including, for example, the frequency of client/counselor contacts and the choice of individual or group job search assistance). In two of the three sites, the local E&T policymakers designed a program that emphasized individualized service plans based on an assessment of the specific needs of each E&T participant. In the third site, the design of the program was determined by the individual assigned to staff the E&T program at the local level: one worker used group orientations and assigned all E&T participants to three components simultaneously; the next worker assigned to this position used individual orientations and assigned participants to one component at a time.

In the state-administered systems, state-level managers reviewed local E&T program design and implementation through on-site program reviews, desk audits of written program reports submitted by each county, and frequent telephone contacts between local sites and state or regional welfare agency staff liaisons to provide clarifications of state policy and advice on local design decisions. In at least three states, the state E&T administrators

directly trained local E&T staff and evaluated local E&T operations. In other sites, regional or district welfare agency staff disseminated state policy to local sites and oversaw local program operations.

Design Decisions in County-Administered Systems

The amount of state influence over E&T design decisions in the six county-administered sites varied widely, ranging from a high level of state control over local E&T design and operations to a high degree of local autonomy. However, because these were locally administered systems, policy-makers in these sites could choose to deliver E&T services directly or by contract with an outside service provider.

Three of the locally administered sites were subject to substantial state control of E&T design decisions. In one site, the state plan required all localities to provide independent job search as the first E&T component for all participants and to offer work experience, vocational training, and education as optional E&T components. This state required all E&T mandatory work registrants to participate in job search once every 6 months and required that job search consist of at least 12 employer contacts over a 4-week period. In the other two locally administered sites with strong state design control, the state also required an initial job search of all mandatory work registrants, to be performed once every 12 months. In one site, the state required E&T work registrants to continue participating in additional service components as long as they received Food Stamp benefits, but local sites could choose which additional components to offer from nine optional components included in the state plan. In the other site, the state required E&T participation of Food Stamp applicants as well as Food Stamp recipients, as a condition of Food Stamp eligibility.

Three of the locally administered sites exercised substantial local control over the design and operation of the E&T program. One state called for local sites to consolidate services under the JOBS program for AFDC recipients and Food Stamp E&T participants, but allowed each county work program unit to determine how to organize services, whether to target

specific clients, and how to integrate services for AFDC/JOBBS and Food Stamp E&T work registrants. Although community work experience was strongly encouraged by state policymakers as the default component for those not participating in education or training, the local service mix in the sample site did not emphasize work experience.

A second site with substantial local control over the E&T service design was permitted to develop its own service sequence and content of E&T service components, selecting from six components included in the state E&T plan. The services developed by local policymakers in this site emphasized services to address motivational and personal barriers to employment, rather than services to upgrade education or vocational skills.

The third site with substantial local control strongly resisted state attempts to influence the local E&T program design, and designed the absolute minimum necessary to meet state E&T requirements: an individual job search component lasting 8 weeks and including 24 employer contacts. Local decision-makers in this site identified the employment barriers of many E&T mandatory work registrants to result from alcohol, drug, and mental problems. They did not believe that the level of resources provided under the E&T program was sufficient to do anything but assuage taxpayer demands for visible work effort by public assistance clients.

FUNDING DECISIONS

State Contributions to E&T Operating Costs

State legislators and administrators also exercised a key influence on E&T program design and operations by determining how much state funding to contribute toward E&T program operations beyond the 100% federal formula funds. Every additional state dollar budgeted for E&T program operations was matched by an additional dollar in federal program funds. For states that contributed state funds to E&T operations, this decision had the potential to substantially increase the intensity of services provided to E&T clients.

Table 6-1 describes the extent that the study states supplemented the 100% federal formula funds for E&T program operations. The first column in Table 6-1 presents the total E&T program expenditures for FY 91 (state and federal costs, excluding participant reimbursements) as a proportion of 100% federal formula funds. The second column presents the state share of operating costs as a percentage of total program costs. The third column displays the total program expenditures for FY 91 per mandatory nonexempt work registrant, and the fourth column summarizes the total FY 91 program expenditures per service placement (excluding NOAAs).

As shown in Table 6-1, four of the study states did not contribute any state dollars to the operating costs of the Food Stamp E&T program. Only one of these states operated a statewide General Assistance program, and GA/Food Stamp recipients in this state were exempted from the Food Stamp E&T program if they were active in the state's GA work program.

Seven states contributed a moderate level of state funds, thereby increasing the total program funds by 10% to 95% over the formula funding level because of the federal match. Only one of these states operated a statewide GA program. In this state, GA/Food Stamp recipients were subject to participation in the Food Stamp E&T program as well as a separate GA work program.

Four states contributed a significant amount of state funds, thereby increasing total program funds by 160% to 650% over the formula funding level because of the federal match. Three of the four states with the highest level of state financial contributions operated the Food Stamp E&T program as a consolidated work program for GA/Food Stamp recipients and Food Stamp recipients not receiving any other public assistance. The fourth state offered GA benefits, but only 1 month each year. This state had adopted an E&T service design that required continuous E&T participation throughout the year by mandatory nonexempt work registrants, as long as they received Food Stamp benefits.

Table 6-1

STATE CONTRIBUTIONS TO FOOD STAMP E&T OPERATING COSTS – FY 91

	<u>Total Program Expenditures as a Proportion of Federal Formula Funds</u>	<u>State Costs as a Proportion of Total</u>	<u>Total Operating Expenditures Per Nonexempt Work Registrant</u>	<u>Total Operating Expenditures Per Service Placement</u>
No state contribution				
State I	100%	0%	\$28	\$60
State J	100%	0%	\$66	\$103
State A	100%	0%	\$39	\$117
State C	100%	0%	\$28	\$58
Moderate state contribution				
State E	110%	5%	\$26	\$58
State H	129%	11%	\$31	\$195
State D	137%	14%	\$23	\$50
State L	160%	19%	\$55	\$175
State G	180%	22%	\$47	\$81
State B	192%	24%	\$76	\$114
State K	195%	24%	\$45	\$40
High state contribution				
State F	260%	31%	\$51	\$52
State O	300%	33%	\$75	\$289
State M	610%	42%	\$111	\$276
State N	750%	43%	\$108	\$294

Higher state contribution levels tended to increase the E&T program expenditures per mandatory nonexempt work registrant and per service placement, but only by a modest amount.¹³ In 8 of the 11 states with no or only a moderate financial contribution, total E&T expenditures averaged less than \$50 per mandatory nonexempt work registrant. In contrast, all four states with substantial financial contributions spent between \$50 and \$100, on average, per mandatory nonexempt work registrant.

In terms of expenditures per service placement (excluding NOAAs), only the three states with the greatest state financial contribution had E&T expenditures that exceeded \$200 per service placement. Even at the highest levels of state participation, the average expenditure levels for the E&T program totaled only about one-tenth of average costs per participant in the JTPA service system.

Local Contributions to E&T Operating Costs

Only two of the study states, both county administered, required local sites to make contributions toward E&T program expenditures. In one of these states, the county was required to contribute half of the nonfederal program costs, or 25% of the total matched funds. This state made high contributions. In the other state, local sites were required to contribute one-fifth of the nonfederal program costs, or 10% of the total matched funds. This state made moderate contributions.

¹³ The state funding level was not the only factor that affected the level of available E&T program resources per work registrant and service placement. Other variables that affected the available resources per service placement during FY 91 included: the federal funding formula for FY 91, which used the total Food Stamp caseload to distribute funds among states, rather than the volume of E&T work registrants; state decisions about what proportion of all work registrants to exempt from E&T participation using categorical or individual exemption criteria; and state decisions about how many service components to require for each participant. In addition, the availability of services provided through nonfinancial referral arrangements was perhaps the most important factor influencing the intensity of the services available to E&T participants.

State Expenditures for Participant Reimbursement

States are required by federal law to provide reimbursement for certain participant expenses during program participation, up to \$25 per month for transportation and other expenses, and up to \$160 per child per month for dependent care expenses. Within these limits, state or local supportive service expenditures are matched dollar for dollar with federal funds. Although states are required to fund these costs, they can choose how to reimburse participants and whether to offer supportive services beyond the level mandated in the legislation.

As described in Chapter 4, the range and extent of participant reimbursements varied across the study sites, as did the amount of funding provided for these costs. Table 6-2 summarizes the planned and actual total expenditure levels (federal and state costs) for participant reimbursement during FY 91 in the study states. The first column presents planned supportive service expenditures as a percentage of all planned E&T expenditures. The remaining columns summarize actual expenditures per service placement during FY 91 for dependent care and transportation costs.

As shown in Table 6-2, planned participant reimbursements ranged from 3% to 29% of total E&T program costs. Average reimbursements for dependent care ranged from zero to \$11 per service placement. Average transportation costs ranged from a low of \$3 per service placement (in a state that emphasized job search services and waited for participants to request transportation assistance before offering cost reimbursements) to a high of \$72 (in a state that offered ongoing transportation allowances to participants in long-term education and vocational training programs).

STATE AND LOCAL PERSPECTIVES ON E&T GOALS AND OBJECTIVES

State and local perspectives on the goals and objectives of the Food Stamp E&T program constituted another major influence on program design decisions. Most state and local decision-makers perceived multiple goals for the Food Stamp E&T program. Among these were:

Table 6-2

**STATE LEVEL OF EXPENDITURES FOR REIMBURSEMENT
OF PARTICIPANT COSTS – FY 91**

	Planned Costs for Participant Reimbursement as a Proportion of Total E&T Costs	Average Dependent Care Costs Per Service Placement	Average Transportation Costs Per Service Placement
State I	16%	\$0	\$9
State J	14%	< \$1	\$17
State A	13%	\$2	\$15
State C	17%	< \$1	\$12
State E	19%	\$0	\$11
State H	16%	< \$1	\$33
State D	24%	< \$1	\$16
State L	10%	\$1	\$18
State G	29%	\$6	\$27
State B	8%	\$4	\$6
State K	19%	\$0	\$9
State F	7%	\$1	\$3
State O	18%	\$0	\$72
State M	7%	\$11	\$9
State N	3%	\$2	\$6

- Fulfilling federal procedural requirements--e.g., operating at least one E&T component, providing the required participant reimbursements, achieving the 50% participation rate performance standard, and issuing notices of adverse action (NOAAs) and implementing sanctions as required for noncompliance.
- Promoting immediate employment for job-ready work registrants, to prevent or shorten the duration of their stay on Food Stamps and to satisfy taxpayers that public-assistance cost containment measures are being implemented.
- Promoting longer-term employability development for less

job-ready work registrants, to help them overcome employment barriers such as lack of basic skills and formal education credentials, lack of work experience, lack of job-seeking skills, or lack of specific occupational skills.

Given the limited resources available to the Food Stamp E&T program, most of the study states and local sites decided to emphasize the first and second goals more than the third goal. These sites required all mandatory nonexempt work registrants to participate in a standardized set of E&T services including job search and/or job search training. A smaller number of sites decided to emphasize all three goals. These sites targeted a smaller subset of work registrants for E&T participation, offered individualized service planning, and made use of some less intensive and some more intensive services, depending on client needs.

Emphasis on Fulfilling Federal Requirements

One of the 15 study sites (in a county-administered system) decided to do as little as possible to meet the federal and state E&T implementation requirements. The local E&T administrator in this site felt that the amount of funding available for the E&T program was not enough to address the severe employment barriers of many mandatory work registrants. This county implemented a single E&T component--independent job search--which was operated by a single staff person located in the fraud investigation unit in the county welfare department. The only in-person contacts during E&T participation in this site were individual orientation sessions that lasted less than 5 minutes, followed up by brief monitoring sessions at the end of 4 and 8 weeks of job search. The objective of job search in this site was purely

procedural compliance, with no emphasis on actually finding a job. This site was in a state that contributed no state funds to the cost of E&T program operations.

Emphasis on Immediate Employment of Job-Ready Clients

Eight of the study sites designed their E&T programs to emphasize job search efforts by job-ready clients. The E&T components in these sites targeted all mandatory nonexempt work registrants and emphasized independent job search (in six sites) or a combination of job search training and job search (in two sites). In most of the study sites in this group, states made little or no financial contribution to E&T operating costs.

Program administrators in two of these sites did not perceive the E&T program as providing services to clients, but rather as an extended part of the Food Stamp eligibility process, making it more difficult to qualify for receipt of Food Stamps. One of these sites required Food Stamp applicants to go through job search as a condition of Food Stamp eligibility.

In the remaining six sites, policymakers perceived the E&T program as a service program, but most felt unable to provide more than a minimal level of services given the limited program funding. Three sites required individuals to conduct a self-directed job search with little, if any, assistance from E&T staff. Two sites provided brief job search training sessions for all E&T participants as the initial program activity. One site used a "funnel" approach, with independent job search required of all participants initially and more individualized job search assistance provided to clients who were unable to locate employment on their own.

In some of these sites, jobs were available in the local labor market for job-ready clients. However, in several sites, labor market opportunities were extremely limited. Policymakers as well as clients in these sites found themselves facing a dilemma: emphasizing job search efforts that were not likely to lead to employment.

Dual Program Emphasis on Immediate Employment and Overcoming Employability Barriers

Six of the 15 study sites designed their E&T programs to emphasize services for both job-ready and less-job-ready work registrants.

Two sites that used the E&T program to provide appropriate services for job-ready clients as well as less-job-ready clients had standardized service sequences for E&T participants, but offered services relevant to clients with employability barriers:

- In one of these sites, a required job search training component covered a variety of topics relevant to those with little work experience or an unstable work history, including goal setting, reality testing, and development of self-esteem, in addition to job search and interviewing techniques.
- In another site, less-job-ready clients were referred to adult basic education, GED preparation, or English language training as a first component if they lacked basic educational skills. Fifteen percent of all service placements were to educational services in this site.

The remaining four sites used individualized service planning to develop employability plans and service sequences tailored to the needs of individual clients. Job-ready clients were assigned to job search or job search training services in these sites, while individuals with more serious employment barriers were assigned to more intensive services, such as education or training. Two sites in this group targeted all mandatory nonexempt work registrants for E&T participation; the remaining two sites targeted several subgroups within the work registrant pool for E&T enrollment--those receiving substantial public assistance payments, those with multiple employment barriers, those likely to benefit from services, and/or those motivated to participate in education or training.

In the states where sites emphasized dual program objectives, the state contributed no funds in one case, some funds in two cases, and substantial state funding for E&T program operation costs in three cases.

CLIENT TARGETING DECISIONS

Use of Categorical Exemptions¹⁴

Client targeting is a multistage process. At the state level, the first stage in targeting a specific group within the Food Stamp work registrant population is the decision about which counties to include in the Food Stamp E&T program. By requesting categorical exemptions for rural counties and for counties with few job opportunities, states can focus the program on a more selective group of work registrants who may be more likely to benefit from program services. If a substantial number of counties with small numbers of work registrants are exempted, this may also conserve scarce program resources and permit the remaining local sites to provide more intensive services to E&T participants. States may also request categorical exemptions for Food Stamp recipients who are within the first 30 days of receipt of Food Stamp benefits; however, none of the study states chose to implement this exemption.¹⁵

Table 6-3 summarizes the extent to which the study states used categorical exemptions to exclude work registrants in certain counties on the basis of low numbers of work registrants, high unemployment, geographic remoteness, and/or lack of employment and training resources. Of the 1,295 counties and independent cities in the 15 states visited, 48% received categorical exemptions.

In four states, categorical exemptions were not used as a tool for client targeting: in these states, the E&T program was operated in all counties. Three of the four states that contributed substantial state funds to the cost of E&T program operations were in this group. Local study sites

¹⁴ Individual Food Stamp recipients who meet federal exemption categories are not required to participate in E&T (as described in Chapter 5).

¹⁵ States that choose not to exempt new recipients within the first 30 days are permitted to reduce the measure of mandatory nonexempt work registrants (the denominator for the participation rate standard) by 10%.

Table 6-3

**USE OF CATEGORICAL AND INDIVIDUAL EXEMPTIONS
BY THE STUDY STATES**

	Planned Categorical Exemptions as a Proportion of Work Registrants (FY 91)	Planned Individual Exemptions as a Proportion of Work Registrants (FY 91)	Planned Total Exemption Rate (FY 91)
State N	0%	0%	0%
State M	0%	5%	5%
State G	3%	7%	10%
State O	0%	14%	14%
State F	13%	7%	20%
State A	0%	22%	22%
State K	13%	10%	23%
State D	23%	2%	25%
State H	20%	6%	26%
State C	14%	24%	37%
State B	36%	1%	37%
State E	37%	2%	39%
State I	37%	6%	43%
State L	42%	6%	47%
State J	65%	10%	75%

in these three states emphasized both job search and employability development objectives. The remaining state contributed no state or local funds to program operations. The local site in this state emphasized minimal procedural compliance objectives.

Six states used categorical exemptions to exclude a moderate percentage of all mandatory work registrants (less than 30% of the total work registrant pool). Four states in this group contributed moderate levels of state funds to E&T program operations; one state contributed no state funds; one state contributed substantial state funds. Four of these states emphasized immediate employment for the job ready as an E&T program goal; two states emphasized employability development as well as immediate employment as E&T goals.

Five states planned to exclude a substantial proportion of the state work registrant population--ranging from 36% to 65% of all work registrants--using categorical exemptions. The two states with the highest rates of categorical exemptions sharply limited the number of counties in which they operated the E&T program to focus on areas where there were jobs and education and training resources, and to conserve scarce program resources. One of these states went even farther to concentrate program operations in only a few sites, by deciding to operate the E&T program in only four of nine counties without categorical exemptions.¹⁶ In the two states with the highest rates of categorical exemptions, the E&T program study sites emphasized both immediate employment and employability development goals. In the remaining three states, the local study sites emphasized immediate employment goals.

Individual Exemptions

The second stage in client targeting is the decision about how to implement individual exemption criteria: the reasons individuals may be

¹⁶ All nonexempt work registrants from the five counties without categorical exemptions were included in the denominator of the statewide participation rate performance standard, even though the E&T program was not operational in these counties.

excused from participation in the E&T program, and how these individual exemption criteria are to be implemented. Under guidelines established by FNS, individual exemption criteria are intended to identify reasons why it may be impractical for an individual to participate in the E&T program, rather than to identify individuals who may have particular service needs or exempt those less likely than others to benefit from E&T services.

As described in more detail in Chapter 5, states used a variety of criteria to exempt individual work registrants, including geographic remoteness, lack of transportation, physical or mental incapacity (including pregnancy), on temporary layoff, non-English speaking, and participating in alternative employment and training programs. As shown in Table 6-3, individual exemptions were expected to account for 10% or less of all work registrants in 12 of the 15 study states. In three sites, between 10% and 25% of work registrants were expected to qualify for individual exemptions.

Client Targeting Within the Nonexempt Work Registrant Pool

Twelve of the 15 study sites required active E&T participation by all mandatory nonexempt work registrants. Thus, universal rather than selective client targeting policies were in place in these sites. Not surprisingly, all eight sites with standardized service sequences that emphasized job search and immediate employment objectives had universal participation requirements, as did the site that implemented independent job search as the minimal E&T service design meeting federal and state procedural requirements.

In addition to targeting all nonexempt work registrants receiving Food Stamp benefits for participation in the E&T program at least once each year, one of the study states in this group required Food Stamp applicants to participate in the E&T job search component at the time of application, prior to determining the applicant's eligibility.

Only 3 of the 15 study sites applied the E&T participation requirements selectively to the mandatory nonexempt work registrant pool. Each of these

sites emphasized employability enhancement services for less-job-ready clients as well as immediate employment for job-ready clients. In one of these sites, however, E&T employability development services attempted to improve participant motivation and self-esteem, rather than enhancing educational or vocational skills.

- In one county-administered site, only new Food Stamp recipients were referred to the E&T program operator for services. Ongoing Food Stamp cases were not required to participate in the E&T program at the time of the annual recertification of Food Stamp eligibility in this site. This site also reserved one of its three E&T service components for GA/Food Stamp recipients. Enrolling GA recipients in a paid work experience component for 20 hours a week was designed to save county General Assistance funds. This enabled the county to close the GA case for the duration of the 120-day paid work assignment. (The cost of work experience wages in this site was paid by JTPA program funds.)
- A second site with selective client targeting policies generally waited for mandatory nonexempt work registrants to initiate a request for services before completing an individualized service plan and enrolling a client in one or more E&T service components. This site offered services of varying intensity to different clients, depending on their level of employability, with the most intensive services reserved for GA/Food Stamp recipients with multiple employment barriers.
- The third site with selective client targeting permitted E&T workers to use their discretion in requiring participation by individuals within the mandatory nonexempt work registrant pool. Individuals who were receiving substantial public assistance benefits or motivated to participate in education and vocational training were more likely to be required to participate in E&T services than other mandatory work registrants. In addition, during FY 91, special demonstration services were targeted to General Assistance recipients between the ages of 18 and 25 at this site.

In each of these sites, selective client targeting was used for several reasons: (1) to focus E&T resources on clients who were more likely to benefit because they were highly motivated to attend training or find employment; (2) to target individuals with identifiable employment barriers, such as limited basic skills or limited work experience; and/or (3) to target individuals receiving cash assistance grants, such as General Assistance, in addition to Food Stamps. Selective client targeting was also necessary to conserve program funds so that more intensive services could be provided to clients who were targeted for E&T participation.

Targeting of Voluntary Participants

None of the 15 sample sites encouraged volunteers to participate in E&T service components paid for out of the E&T program budget. Three sites did not permit voluntary participants to enroll in E&T services. Nine sites permitted volunteers, but enrolled zero or very few volunteers in the E&T program during FY 91. The actual numbers of voluntary participants at these local E&T sites ranged from "one over the last 5 years" to about 5% of the E&T enrollment pool.

Three of the 15 sites had more substantial involvement by volunteers, at least on paper. One state that offered job search training as the most frequently used component planned that 10% of its service placements during FY 91 would be volunteers. Two study states did not permit volunteers to participate in the service components funded with E&T funds, but counted as E&T volunteers Food Stamp recipients who were identified as JTPA participants through a data tape match implemented at the state level. In these two sites, volunteers were reported as accounting for 30% to 40% of all E&T service placements, although there was no evidence that these individuals had been referred to the JTPA system by the E&T program.

SERVICE DESIGN DECISIONS

The 15 study sites used a variety of different service components in their E&T service designs. Four categories of services were used for E&T participants: job search/job placement services, job search training and preemployment training, education and vocational training, and work experience. Chapter 4 described the content of the services provided to E&T participants under each of these categories. In this section, we summarize the frequency of service placements in each type of service, and the decisions made by states and local sites about the relative service emphasis of their E&T programs.

Table 6-4 summarizes how the study sites used different categories of E&T services during FY 91. With the exception of one site, these figures are

Table 6-4
SERVICE FREQUENCY
(Percentage of All FY 91 Service Placements)

	Job Search	Job Search Training	Education/ Vocational Training	Work Experience	Other*
SITES IN GROUP 1: JOB SEARCH EMPHASIZED					
A	100	--	--	--	--
B	94	<1	5	1	--
C	96	--	4	--	--
D**	54	--	46	--	--
E	91	--	10	--	--
F	85	12	3	--	--
G	94	4	2	--	--
SITES IN GROUP 2: JOB SEARCH TRAINING EMPHASIZED					
H	26	64	6	4	--
I	35	62	2	--	--
J	6	79	15	--	--
J**	3	37	61	--	--
K	37	54	--	8	--
L	44	39	17	1	--
SITES IN GROUP 3: EDUCATION AND VOCATION TRAINING EMPHASIZED					
M	63	2	34	<1	--
N	12	11	55	9	14
O	13	27	57	3	--

* One state received FNS approval to report employability development planning as a separate E&T service component. Another state included assessment as a separate component in the state plan (provided to a small number of participants through referral to the JTPA system), but did not report placements to this component separately in the statistical report we obtained.

** Service mix after "data tape matches" with JTPA were added.

Note: Rows may not total to 100 because of rounding.

based on actual service placements in the local study sites over a 6- to 12-month period during FY 91. For one site, only 3 months of local data were available. In two study states, the mix of E&T service placements reported to FNS included Food Stamp recipients participating in the JTPA system who were identified through data tape matches. For these sites, the service mix is presented twice in Table 6-4: without and with the supplementary service placements identified through the data tape matches. In assigning sites to a category based on the mix of services provided to E&T clients, we used the service mix before the addition of the placements identified through matching of data tapes.

Job Search as the Predominant Service

As shown in Table 6-4, seven of the study sites decided to use job search as the predominant service component for E&T participants. In each of these sites, job search accounted for 85% or more of all E&T service placements. Six of these sites emphasized immediate employment of job-ready clients as the primary program objective. The seventh site emphasized fulfillment of federal procedural requirements as the objective.

Job Search Training/Job Search as the Predominant Services

Five study sites decided to use job search training followed by job search as the predominant services. In three sites, the content of the job search training component included both job search training and job search. In one site a required job search training component was always followed by a separately reported job search component, unless the client left the program prior to that point. In the fifth site, participants were usually assigned to job search training and job search components concurrently. Job search training accounted for over half of all service placements in four sites. In the fifth site, job search training in combination with job search accounted for 83% of all service placements.

Two of the sites that used job search training followed by job search as the predominant service pattern for E&T emphasized immediate employment for job-ready participants as the primary E&T program objective. In these sites, the content of job search training focused narrowly on the mechanics of job search (e.g., how to follow up job leads, how to prepare resumes, how to conduct job interviews). The remaining three sites that used job search training as the predominant service emphasized dual program objectives of immediate employment for the job ready and employability enhancement for less-job-ready clients. In these sites, the content of job search training included a broader set of topics, such as life planning, goal setting, survival skills, and self-esteem building, in addition to the mechanics of job search. In addition, two of these sites made over 15% of all service placements to education or vocational training components.

Education and Vocational Training Emphasized

Finally, three sites made a significant proportion of all service placements in education or vocational training components, ranging from 34% to 57% of all service placements. These sites emphasized employability development for less-job-ready clients as an important goal of the E&T program. To further this goal, each of the states contributed substantial amounts of funds toward the E&T program operations budget. Two of these sites selectively targeted particular hard-to-serve groups within the mandatory nonexempt work registrant population and tried to match participants who had serious employment barriers with more intensive services funded by the E&T program budget. The third site used nonfinancial referral arrangements to provide education and training services to hard-to-serve clients.

Work experience was not used very frequently in any of the study sites visited, although it was emphasized in state plans. Work experience was offered as a service component in only seven study sites.

Summary of Variations in E&T Service Designs

Table 6-5 summarizes variations across several different dimensions of the content and frequency of services provided to E&T participants in the study sites. These dimensions include¹⁷:

- Whether formal assessment instruments were used during E&T intake and service planning.
- Whether service assignment procedures were individualized or standardized.
- Whether the site emphasized job search, job search training, or education and vocational training as the most frequently used type of service.
- Whether job search components emphasized procedural compliance with requirements for individual job search or provided substantial assistance in conducting a successful job search.
- Whether job search training was offered and, if so, whether the content of job search training focused narrowly on job search techniques or more broadly on the needs of less-job-ready clients, by addressing career exploration, decision-making, and life skills.
- Whether job search training was targeted to all E&T clients, the most job ready, or the least job ready.

An examination of Table 6-5 reveals that the sites that emphasized education and vocational training services were more likely than other sites to use individualized service assignment procedures, offer substantial assistance on how to conduct an effective job search, provide job search training oriented to the needs of less-job-ready clients, and target less-job-ready individuals for participation in job search training components. At the other end of the continuum, sites that emphasized job search as a stand-alone service were less likely than other sites to use any formal assessments and more likely to use standardized service sequences and job search designs that emphasized procedural compliance.

¹⁷ These design variations have been described in more detail in previous chapters. Assessment and service assignment procedures are described in Chapter 5, while the content of job search and job search training components is described in Chapter 4.

Table 6-5

SUMMARY OF KEY VARIATIONS IN E&T SERVICE DESIGNS

	Use of Formal Assessments			Service Assignment Procedures			Service Emphasis		
	For All Clients	For Selected Clients	Not Provided	Individualized	Some Variation Possible	Single Service or Set Service Sequence	Job Search	Job Search Training	Education and Vocational Training
SITES IN GROUP 1: JOB SEARCH EMPHASIZED									
A			✓			✓	✓		
B			✓			✓	✓		
C			✓		✓		✓		
D			✓		✓		✓		
E		✓			✓		✓		
F		✓				✓	✓		
G			✓		✓		✓		
SITES IN GROUP 2: JOB SEARCH TRAINING AND JOB SEARCH EMPHASIZED									
H		✓			✓			✓	
I	✓				✓			✓	
J		✓			✓			✓	
K			✓			✓		✓	
L	✓			✓				✓	
SITES IN GROUP 3: EDUCATION AND VOCATIONAL TRAINING EMPHASIZED									
M		✓		✓					✓
N		✓		✓					✓
O	✓			✓					✓

Table 6-5

SUMMARY OF KEY VARIATIONS IN E&T SERVICE DESIGNS (Concluded)

	Orientation of Job Search		Job Search Training			Job Search Training Participants			
	Procedural Compliance	Substantial Assistance	Not Offered	Content		N/A	All E&T Clients	Most Job-Ready	Least Job-Ready
				Narrow	Broad				
SITES IN GROUP 1: JOB SEARCH EMPHASIZED									
A	✓		✓			✓			
B	✓		✓			✓			
C	✓		✓			✓			
D	✓		✓			✓			
E	✓		✓			✓			
F	✓				✓				✓
G	✓				✓				✓
SITES IN GROUP 2: JOB SEARCH TRAINING EMPHASIZED									
H	✓			✓			✓		
I	✓			✓			✓		
J	✓			✓			✓		
K	✓				✓		✓		
L		✓			✓		✓		
SITES IN GROUP 3: EDUCATION AND VOCATIONAL TRAINING EMPHASIZED									
M		✓			✓				✓
N		✓			✓			✓*	✓*
O		✓		✓*	✓*			✓*	✓*

* Two different job search training/employment components were offered in these sites.

SERVICE DELIVERY ARRANGEMENTS

Overall Service Delivery Arrangements

The 15 case study sites used three different overall designs for the administration and delivery of E&T services:

- Direct operation of all funded E&T activities and services within the local welfare agency, either in a separate work program unit or within another administrative unit in which one or more staff persons were designated as responsible for E&T program operations and service delivery.
- Contracting the operation of the entire E&T program to another agency or organization.
- Administration of intake, service assignment, and case management of services within the local welfare agency, with contracts for the operation of some or all service components by another agency or organization.

As described previously, decisions about how to organize the delivery of E&T services were generally made at the state level in state-administered systems and at the local level in locally administered systems.

Direct Operation of All Funded E&T Services

In six of the case study sites, all E&T operations and service components funded with E&T resources were provided by staff within the local welfare office. In three sites, E&T program operations were located in a separate Food Stamp E&T unit. In one site, E&T program operations were part of a work program unit that also housed JOBS program staff. In two sites, E&T responsibilities were assigned to a single individual. This individual was housed in a Food Stamp benefits unit in one site and in the unit that investigates welfare fraud in the other site.

The service components operated by in-house staff in these sites included independent and/or supervised job search (all six sites), job search training (two sites), and work experience (three sites). Five of the six

offered additional service components through nonfinancial referrals to existing local programs and agencies. Services provided through nonfinancial referrals in these sites included education and vocational training (five sites), job search training (two sites), and job placement services (one site).

The sites in which policymakers decided to operate E&T programs in-house with welfare agency staff were very diverse. They included three county-administered and three state-administered sites, and sites in both urban and rural locations. Four of the six sites emphasized the provision of individual job search as the primary E&T component, with relatively little hands-on staff supervision or support of E&T participants during job search. However, the other two sites emphasized the provision of job search training to E&T participants, and E&T staff in one site provided active support and counseling to E&T participants during job search.

Contract with Another Agency for the Operation of the E&T Program

Five of the case study sites used contracts with another agency to operate the entire E&T program, including intake and service planning, assignment to services, operation of one or more service components, referral to additional components, and monitoring participant progress. In the four state-administered sites in this group, the decision to contract out the E&T program had been made at the state level. Three states contracted with the state employment service for statewide operation of the E&T program. One state contracted with the employment service in less populous E&T counties but contracted with the general unit of local government in more populous counties. In the site we visited in this state, the designated local governmental unit had assigned responsibility for the E&T program to the county department of human resources, which also administered the JTPA system. In the fifth state, which was in a county-administered system, the county welfare agency contracted with another county agency (the county department of labor, which administered the JTPA system, as well as operating work programs for other public assistance clients).

In the sites that delegated responsibility for E&T operation to other agencies, the expertise of the employment service or local agency administering other employment programs was the stated reason for delegating the operation of the E&T program. However, this type of service delivery arrangement appeared to result in a rather narrow range of E&T services being provided to program participants. In three sites in this grouping, the services provided directly by the E&T contractor were limited to independent job search. In the remaining two sites job search training followed by job search contacts with local employers were required of most E&T participants.

In four of the five sites in this group, job search training or job search comprised 95% or more of all E&T service placements. Although non-financial referrals to other community agencies for education and vocational training services were available in theory, in these sites, nonfinancial referral linkages did not result in more intensive services for significant numbers of E&T participants. In the fifth site, the employment service staff assigned to operate the E&T program referred a larger number of participants to education and vocational training programs, so that 15% of all local E&T service placements were in this category.

Administration of E&T Operations in Welfare Agency, with Contracts for Services

In four case study sites, E&T staff were housed in work program units that conducted E&T intake and service planning, assigned E&T participants to service components, provided case management and monitored program compliance, and made referrals to outside agencies and organizations for the delivery of most or all E&T services. In two sites, staff within the E&T unit in the local welfare office contracted all service components to other agencies and organizations. In one site, the E&T unit operated work experience and contracted out all other service components. In the fourth site, the E&T unit operated employability development planning and independent job search as in-house service components and contracted with 14 other local service providers for a variety of additional services.

Three of the four local sites in this category had E&T service designs that emphasized individualized service planning and the provision of education and/or vocational training to a substantial proportion of all E&T participants. A variety of local service providers were used in each of these sites, some of which were contracted to provide services to E&T participants using E&T program funds and some of which provided services through nonfinancial referral arrangements. The fourth site had a standardized sequence of two or three service components required of all E&T participants, and contracted with a single organization--the local JTPA administrative entity, which was also a county department--for the provision of all E&T services. This is one of only two study sites that did not use nonfinancial referral linkages to expand the range of service components used for the Food Stamp E&T program.

Contracted service providers in these sites included community colleges (one site), proprietary schools (one site), educational institutions (one site), community-based organizations (three sites), the local JTPA administrative entity (two sites), and the local office of the state Job Service (one site). Services provided by outside contractors included job search training and job search (three sites), job development/job placement services (two sites), vocational training (one site), and special comprehensive service packages combining basic skills remediation and occupational skills training for hard-to-serve clients (one site).

The sites that operated the E&T program using this organizational structure had some other similarities. In all four sites, the E&T program was integrated with the JOBS program for AFDC recipients at the staffing level (although the services for the two groups were completely consolidated in only two of the four sites). Three of the four sites were located in metropolitan areas that had a wide range of education and training providers available in the local community. Half the local sites in this category were state administered and half were county administered.

DECISIONS ABOUT CONSOLIDATING E&T WITH OTHER WORK PROGRAMS

In designing their Food Stamp E&T programs, states and local welfare agency policymakers had to decide whether to operate the E&T program as a separate and distinct program or to consolidate local program administration and/or service delivery with the operation of other work programs for public assistance recipients. In some local sites, the only other public assistance program was the federally mandated AFDC program, which requires mandatory work registrants to participate in the JOBS work program. In other local sites, both the AFDC and GA programs had implemented work requirements as part of the provision of financial assistance to needy residents. Each of these work programs provided different opportunities for the consolidation of services with Food Stamp E&T, in whole or in part.

Consolidation with the JOBS Program for AFDC Recipients

The JOBS work program for AFDC recipients was operational in each of the 15 sample sites, although it was still in the early stages of start-up in one site at the time of the site visit. At the outset of this study, we hypothesized that consolidation might be widespread because of the potential benefits to be gained from E&T program consolidation with JOBS: savings in program administrative costs, the opportunity to use experienced service providers and program staff with a history of providing work-related services to public assistance clients, and economies of scale from serving larger volumes of clients.

Although we found that consolidation of planning, policy, and administrative oversight of the JOBS and Food Stamp E&T work programs did occur at both the state and local levels in a number of the study sites, this did not generally lead to consolidation of services or service delivery arrangements for AFDC and Food Stamp E&T participants. Barriers to consolidation of the two programs at the service delivery level included (1) perceptions that the service needs and employment barriers of the clients of these two programs differed substantially; (2) the dramatically different levels of funding available for the provision of services under JOBS and Food Stamp E&T; and

(3) the different regulatory requirements for the two programs, particularly in the areas of required participation rates and sanctioning procedures for noncompliance.

As a result, 11 of the 15 case study sites operated the Food Stamp E&T program as separate and distinct from the JOBS program for AFDC recipients at the service delivery level. In these sites, although E&T case workers and JOBS case workers were sometimes housed in the same units, the Food Stamp E&T program had its own distinct staff who worked only with E&T participants, and E&T service components were also designed specifically for the Food Stamp E&T program. In a 12th site, case management staff in a consolidated work program unit monitored mixed caseloads of JOBS and Food Stamp E&T clients, but the service components to which work registrants of each program were referred were separate and distinct.

Nevertheless, even in these sites, there were several examples of individual service components that were consolidated with services for JOBS clients at the service provider level:

- In one site, the local employment service was a contracted service provider for both JOBS and Food Stamp E&T services. Although case management services were separate and distinct for participants in the two programs, a consolidated job club component was operated jointly for JOBS and E&T participants.
- In a similar arrangement, a case study site had arranged for the provision of job club services to E&T participants through a nonfinancial referral arrangement with the local JTPA administrative entity. This agency operated the job club as a consolidated service for participants in the Food Stamp E&T, JOBS, and JTPA programs.
- In another case study site, the local community college had worked jointly with the JOBS and Food Stamp E&T programs to develop a 2-day "human potential" workshop for participants in both the JOBS and E&T programs. This preemployment training workshop was operated by the community college with a \$30 fee, which was paid by the E&T program in two installments from the monthly participant reimbursement allowance of \$25. Participants entering this workshop were reported as placements in the education component.

In contrast to the 12 sites where there was minimal or no overlap between the design and operation of the E&T and JOBS programs were 3 case study sites where the state had consolidated the Food Stamp E&T program with the JOBS program. Each of these states designed its consolidated JOBS/E&T work program around the development of individualized service plans that provided education and vocational training services to those with serious employment barriers, and job search/job search training to those who had recent employment experience and were "job ready." Each of these sites had a statewide GA program during FY 91, and each was willing to invest substantial state resources above and beyond the 100% federal funding level for the Food Stamp E&T program to provide intensive services to E&T clients, particularly those receiving General Assistance. In two of the three sites, the funding of intensive services to those actually participating in E&T was made possible because of highly selective client targeting: not all mandatory nonexempt E&T work registrants were expected to participate.

Two of the three sites with consolidated work programs also offered E&T participants supportive services equivalent to those offered JOBS clients, with 100% state funds paying for any additional supportive service costs beyond the \$25 per month matched by the Department of Agriculture for E&T participants. The third site had different supportive service policies for JOBS and E&T participants in its consolidated work program, and also operated some service components that were specifically for JOBS or E&T participants. (The contracts for E&T participants were somewhat less costly and provided less intensive services than those for JOBS participants.)

Consolidation with Work Programs for GA Recipients

GA payments were provided to employable individuals in seven case study sites. GA programs were state mandated and state funded in five sites; in two study sites, GA was a county-funded program. In sites with General Assistance programs, several design options were possible in terms of consolidation and/or coordination between the Food Stamp E&T program and other work programs for GA recipients:

- Operation of a separate and distinct GA work program, with the provision that GA/Food Stamp cases are exempt from Food Stamp E&T, as long as they participate in the GA work program.
- Operation of a separate and distinct GA work program with the requirement that GA/Food Stamp cases participate sequentially in both programs.
- Operation of the Food Stamp E&T program as the sole work program in which both Food Stamp Only cases and GA/Food Stamp cases are required to participate.

Consolidation of GA work programs and the Food Stamp E&T program was selected by states that had made a commitment to invest substantial state funds for the delivery of intensive services to E&T participants. By including GA/Food Stamp recipients as Food Stamp E&T participants, these states obtained not only 100% federal formula funds, but also the 50% federal match for services to address some of the employability barriers faced by GA recipients.

In contrast, in the states that offered less intensive Food Stamp E&T services, additional GA work programs were used to supplement the available E&T services for GA recipients. By requiring GA recipients to participate in both the Food Stamp E&T program and a state-administered or locally administered GA work program, these public assistance agencies could gain more control over the GA caseload.

Separate GA Work Program with GA Work Participants Exempt from E&T

One of the case study sites operated a separate work program for individuals participating in its statewide General Assistance program and exempted GA/Food Stamp recipients from participation in the Food Stamp E&T program, as long as they were actively participating in the GA work program. The GA work program consisted of a job search component, followed by mandatory workfare. At the local site we visited, although noncompliant GA/Food Stamp work registrants were supposed to be referred to the Food Stamp E&T program, this referral linkage was apparently not in effect.

Partly because it was not consolidated with the work program for GA recipients, the Food Stamp E&T program in this site was considered a low priority. Food Stamp recipients who were neither on General Assistance nor AFDC were perceived to have so many barriers to employment (20% to 30% homeless and with high incidence of mental health problems and/or drug addiction) that the funds available from the Food Stamp E&T program were not seen as permitting a meaningful program response. Consequently, this local site undertook the absolute minimum of E&T services mandated at the state level: a single component consisting of 8 weeks of independent job search.

Separate GA Work Program with GA Work Participants Also Required to Participate in E&T

Three case study sites operated separate work programs for GA recipients but also required GA/Food Stamp recipients to participate in the E&T program. In one of these sites, participation in Food Stamp E&T job search or job search training components was required before participation in the GA work program. Once GA work program participation began, this program expected continuous participation by GA recipients in job search. In the other two sites, participation in the Food Stamp E&T program generally occurred after the GA/Food Stamp recipient had participated for a time in unpaid community work experience through the GA work program. In one of these sites, GA recipients were selected for 6-month-long paid work experience positions through the Food Stamp E&T program when an opening occurred in the limited number of paid work experience slots. (Wages were paid by the JTPA program, not the E&T program budget.)

Case management for the GA work program and the Food Stamp E&T program was consolidated in two of the three sites, but the two programs retained their separate identities, even when the services provided by the two programs were similar.

Operation of the Food Stamp E&T Program as a Consolidated Program for GA/Food Stamp and Food Stamp Only Cases

In the three sample sites in this category, no separate GA work program existed. Both GA/Food Stamp cases and Food Stamp Only cases were referred to the Food Stamp E&T program if they were subject to work registration. These were the same three sites that consolidated their Food Stamp E&T programs with the JOBS program for AFDC recipients. Thus, in these three sites, a single work program provided individualized services to participants based on their assessed needs, whether they were receiving AFDC benefits, GA benefits, or only Food Stamps.

Two of these sites also took advantage of the Food Stamp E&T program funds to target special services to GA recipients. In one site in which GA benefits were available for only 6 months of every year, the state had created a separate intensive service track within the consolidated work program for GA recipients identified as hard to serve. Individuals selected for this special service track received 6 to 9 months of intensive basic skills and occupational skills training, supportive services, preemployment training, and placement assistance from special contractors. Another site had undertaken a special demonstration project within its consolidated work program during FY 91 to target GA recipients between the ages of 18 and 25 with intensive education and vocational training services, training stipends, and case management services.

The third site required all GA/Food Stamp recipients to participate in education components if they lacked a high school education. In this site, education was provided through nonfinancial referral arrangements with local educational institutions.

EMPHASIS ON COORDINATION WITH LOCAL EMPLOYMENT AND TRAINING PROGRAMS

As a general pattern, the case study sites used E&T budget funds for the operation of job search, job search training, and work experience components,

while using nonfinancial referral linkages with existing community services for the delivery of education and vocational training services to Food Stamp E&T participants. Exceptions to this pattern occurred in several sites, as follows:

- Two sites did not offer education or vocational training services as E&T components, and made no use of nonfinancial coordination linkages with other agencies for formal E&T service placements.
- Four sites used nonfinancial coordination linkages more broadly: to provide job search/job placement services in addition to education and training.
- At the other end of the spectrum, two case study sites did not depend entirely on nonfinancial coordination linkages for education and vocational training; they used a substantial portion of their E&T budgets to contract for the delivery of education and vocational training services to E&T participants.

When nonfinancial coordination linkages were arranged at the state level, they were usually formalized in written interagency agreements. More commonly, service coordination for the delivery of vocational training and education services was the responsibility of county E&T program operators and service delivery staff. At the local level, service coordination and nonfinancial referrals were usually based on informal arrangements at the staff level, rather than on formal interagency agreements.

To encourage local coordination among different employment and training agencies and institutions at the local level, several state public assistance agencies required the formation of local coordination committees of all potential providers of services to Food Stamp E&T participants (e.g., the local community colleges, school districts, welfare agency, and other social service agencies). These coordination committees were required to meet regularly to discuss how they could coordinate services more effectively.

As described in more detail in Chapter 4, nonfinancial coordination linkages did not result in the participation of large numbers of E&T clients in education and vocational training components in most of the case study sites. In 9 of the 13 sites that used only nonfinancial coordination

linkages for the provision of education/training components, these services accounted for less than 15% of all E&T service placements.

Barriers to the more widespread utilization of existing community resources for E&T clients included: (1) service sequencing that often required participation in job search, job search training, or work experience before participation in education or vocational training components; (2) a lack of emphasis on the education and vocational training options during E&T orientation sessions; (3) the need for client initiative to follow up on a referral to an education or training provider and enroll in an available course; (4) a reluctance by JTPA-funded service providers to enroll large numbers of E&T participants in vocational training because they were seen as too high risk or, alternatively, as not needy enough to qualify for priority target groups; and (5) the inability of E&T staff in many sites to provide effective case management services or to track E&T clients participating in education or vocational training programs.

Across all the case study sites, nonfinancial coordination linkages were used to refer E&T participants to the following community resources:

- The public school system--high schools, adult schools, or community colleges--for enrollment in Adult Basic Education (ABE), General Educational Development (GED), or English as a Second Language (ESL) classes (10 sites).
- The local JTPA system for job development/job placement/job search services (2 sites), educational services (3 sites), or vocational training services (10 sites).
- Community-based organizations for literacy training (1 site).
- The local employment service for job placement services (2 sites).
- The local office of the state vocational rehabilitation agency for assessment and the provision of vocational rehabilitation services (2 sites).
- The local mental health agency for mental health or drug/alcohol counseling (2 sites).

Across all the case study sites, four sites stand out as having especially effective coordination linkages for the provision of services to E&T participants through nonfinancial referrals. Three of these sites developed individualized service plans for E&T participants, rather than requiring participation in a standard sequence of services. In the fourth site, education was required as the first E&T component if individuals did not have a GED or read below the fifth-grade level.

- In one site, the county welfare agency had developed formal coordination agreements with most of the local service agencies and educational institutions, including vocational rehabilitation, local educational agencies, mental health agencies, and the JTPA system. This site had an active coordinating council of all community agencies that met quarterly to discuss inter-agency coordination issues. Coordination was also emphasized by informal staff-level contacts. Coordination linkages were used in this site to provide ABE, GED, and literacy training to E&T participants through the JTPA system or the local community college, and vocational training through the community college. A total of 17% of all E&T service placements in this site were education or vocational training placements through nonfinancial referrals. E&T case workers in this site actively helped E&T participants to locate appropriate training courses and provided case management during training. Some of the referral agencies provided participation reports back to the E&T case workers; in other cases, E&T clients were responsible for getting validated copies of attendance and grade records to their E&T case workers.
- In a second site, E&T case managers were familiar with a wide range of educational and vocational training service providers in their service-rich community. This program invited mandatory nonexempt work registrants and volunteers to request assistance from the E&T program in developing an employability plan involving education or vocational training from community institutions, with substantial supportive services from the welfare agency in the form of tuition, books, tools, transportation expenses, and child care, as needed. Nonfinancial referrals were made to local vocational technical schools, adult basic education programs, community colleges, and the JTPA system (which in turn had contracts with a large number of education and training institutions). Over 30% of all E&T service placements in this site were the result of nonfinancial referrals. E&T case managers maintained frequent contact with clients participating in education and vocational training programs to monitor their progress and approve continued supportive service payments.

- In the site that required E&T participants to enroll in educational programs if they did not have a GED or read below the fifth-grade level, education and vocational training comprised over 50% of all E&T service placements. Coordination linkages for E&T services included nonfinancial referrals to local adult basic education providers for GED preparation training and local community-based organizations for literacy training. In addition, vocational training referrals were made to local community colleges and community-based organizations, as well as the JTPA system. It was acknowledged in this site that the JTPA system would screen E&T referrals for likelihood of success before enrollment in JTPA programs. The E&T program provided separate case managers to monitor participants enrolled in education or vocational training programs.
- In the fourth site with effective linkages for the provision of E&T services through nonfinancial referral arrangements, the local welfare office had developed service coordination agreements with public educational institutions, the local employment service, the vocational rehabilitation agency, and the three JTPA service delivery areas that served this large metropolitan county. In addition, the welfare agency was a member of a local interagency coordination council that met monthly. Services provided through nonfinancial coordination linkages with the public schools included remedial education, high school completion, GED preparation and testing, and job club. The local employment service was used as a resource for job referrals. The local vocational rehabilitation agency provided counseling, job training, and placement services to E&T clients that met eligibility guidelines. The JTPA system provided both job development/job placement services, and, less frequently, vocational training services to E&T participants under nonfinancial referrals. E&T case managers in this site were required to document the progress of participants assigned to education components every 5 months or at the end of the school semester.

A fifth site had strong formal coordination linkages with the adult education system, which offered ABE, GED, and ESL services to E&T participants with basic skills deficiencies. As part of these formal referral arrangements, the education agency provided written acknowledgment of client entry into educational services and submitted information on participant progress to the E&T contractor. However, coordination linkages with the GA work program and the JTPA system remained relatively undeveloped in this site.

SUMMARY OF E&T DESIGN OPTIONS

The Decision to Emphasize Procedural Compliance

Policymakers in 1 of the 15 case study sites decided to make the satisfaction of state and federal procedural requirements with minimal effort the primary objective of the local Food Stamp E&T program. Decision-makers in this county-administered site believed that there was such a mismatch between the level of resources available under the E&T program and the serious employability barriers of most of their Food Stamp work registrants that it was not possible to design meaningful services for E&T participants. Hence, this county welfare agency decided to operate the E&T program in-house as a self-contained program staffed by one person. In this site, the E&T program required a minimum level of independent job search effort by all nonexempt work registrants as the only service component. No coordination using either financial or nonfinancial referral linkages with outside services occurred in this site.

The Decision to Emphasize Immediate Job Search

Policymakers in 8 of the 15 case study sites decided to make the promotion of immediate employment for job-ready work registrants the primary objective of their local Food Stamp E&T programs. Six of the eight sites characterized their E&T work registrant populations as largely job ready. One site identified a subset of all work registrants as individuals with serious employment barriers, but decided to emphasize procedural compliance with job search requirements in its E&T service design, rather than employability development. Administrators in another site said that a significant percentage of the Food Stamp work registrant population was poorly educated, with a core subgroup of long-term Food Stamp recipients. However, given the limited E&T program funds and pressures from FNS to operate the E&T program in a large number of counties, decision-makers in this state felt constrained to offer only minimal E&T services.

States exercised the dominant decision-making role in seven of the eight sites that decided to emphasize immediate employment of E&T participants. In

half of the eight sites, the E&T program was operated in-house by public assistance agency staff. In the other half, the operation of the entire E&T program was contracted out to the state employment service or a local public agency.

Although the E&T program was housed in the same unit as the JOBS program in one site and was contracted to an agency also serving JOBS clients in another site, there was little consolidation of services between E&T and JOBS in these sites. Clients of the E&T program and the JOBS program were perceived as having different service needs. The two programs also had dramatically different levels of funding.

In six of the eight sites, a stand-alone job search component was the predominant E&T service. Two sites required brief job search training workshops covering job search techniques, followed by required job search as the service sequence required of most E&T participants. In all eight sites, E&T participation was required of all mandatory nonexempt work registrants. Assignment to services tended to follow a standardized service sequence in these sites.

Nonfinancial coordination linkages with local educational institutions and/or the JTPA system were in place in all eight sites to provide education and vocational training services to E&T participants, but accounted for less than 15% of E&T service placements. Referrals to education and vocational training services were not integrated into E&T program designs in these sites: these training options were not emphasized at E&T orientation sessions, and service sequencing patterns did not encourage receipt of these services.

The Decision to Emphasize Employability Development for a Subset of E&T Participants

Policymakers in six of the case study sites decided to emphasize employability development for less-job-ready clients as one of the objectives of their local Food Stamp E&T programs. One of the six sites characterized

its Food Stamp work registrant population as largely job ready. Two sites identified both job-ready and less-job-ready groups within the Food Stamp work registrant pool. Three sites characterized many of their work registrants as having serious employability barriers.

Interestingly, local decision-makers played an active role in the design of the content and sequencing of E&T services in four of the six sites. In four sites, public assistance agency policymakers decided to administer the E&T program in-house but contracted with one or more outside agencies for the operation of individual service components. One site operated the entire E&T program in-house; one site contracted with the state employment service for the operation of the entire program.

The study sites that decided to emphasize employability development services for Food Stamp E&T clients were more likely to undertake complete or partial consolidation of services between E&T and the JOBS program. In three sites, the two programs were completely consolidated, with integrated staff and identical or similar menus of services for E&T and JOBS program clients. In one site, case management services for E&T and JOBS clients were consolidated within the public assistance work program unit, but service components were distinct. In another site, the E&T services contractor operated a consolidated job club component for E&T and JOBS clients.

The services designed by the sites that attempted to address the employability barriers of less-job-ready clients included a wider variety of different options and, in four of the six sites, used an individualized service planning process to match participants to the most appropriate E&T service component. Three sites provided job search training as the most frequent service component but included goal setting and life skills training as part of the content of this component. Three sites provided education and vocational training to a substantial proportion of E&T participants.

In three of the six sites, selective client targeting was used, rather than requiring all mandatory nonexempt work registrants to participate. One site targeted new Food Stamp cases and GA recipients; the other two sites

targeted work registrants who were motivated to participate in education or training, as well as individuals receiving substantial public assistance benefits and those with serious employment barriers.

One of the six sites did not offer education or vocational training as an E&T component, nor did it use nonfinancial coordination linkages with any outside organizations for E&T services. In contrast, five of the six sites had particularly effective coordination linkages with community providers of education and/or vocational training services and used these coordination linkages for a substantial number of E&T service placements. These linkages involved financial contracts for services in two sites and formal non-financial agreements with local service agencies and educational institutions in all five sites.

FACTORS INFLUENCING E&T PROGRAM DESIGN DECISIONS

Among the factors that had the greatest influence on the E&T design decisions made by state and local policymakers in the study sites were the limited level of available funding, the federal 50% participation rate performance standard that was in effect through FY 91, the JOBS program design and implementation, and the existence of state and local General Assistance programs. The level of urbanization, the perception of the job readiness of E&T work registrants, and the mix of state vs. local roles in E&T design decisions also appeared to influence local E&T program designs and implementation practices.

Level of E&T Funding

The limited level of E&T funding provided by the federal government had the strongest effect on state and local design decisions in the study sites. Even after state supplementation, funding levels that ranged from \$23 to \$111 per mandatory nonexempt work registrant were not sufficient to provide very intensive services, even for relatively job-ready clients. Five of the six sites that used the E&T program to address employability barriers for less-job-ready clients contributed moderate or substantial levels of state funds

to expand the resources available for E&T programming. In addition, three of these sites used selective client targeting to focus limited funding on a smaller number of program participants. However, even in these sites, the average cost per service placement was less than \$300.

Given the limited resources within the E&T budget, it is not surprising that nonfinancial coordination linkages were used to offer education and vocational training service components in most sites. However, these linkages were effective in expanding the services received by significant numbers of E&T participants in only five sites.

The limited level of E&T funding would not have been so influential in shaping E&T program designs had it not been for the federal 50% participation rate standard. In combination, these two factors caused many program managers to design relatively "thin" services for large numbers of E&T participants.

The 50% Participation Rate Standard

As indicated above, the federal 50% participation rate performance standard made it difficult for local sites to implement E&T designs that offer more intensive E&T services to smaller numbers of program participants. Each study site had to decide how to respond to the existence of the participation rate performance standard. Some states responded by implementing strategies for achieving higher reported participation levels across all work registrants--e.g., enrolling large numbers of work registrants in independent job search, ensuring that notices of adverse action (NOAAs) were issued for noncompliance, or using multiple service placements for each participant.

Other states responded by requesting categorical exemptions for counties with fewer than 500 mandatory work registrants or high unemployment rates. This strategy conserved scarce operating funds for a smaller number of counties offering greater economies of scale and more plentiful job opportunities.

Alternatively, several study sites that emphasized employability development services for E&T participants were less concerned with whether or by how much they exceeded the 50% participation rate standard. In these sites, meeting the performance standard was one management goal, but not the driving force behind all E&T design decisions. In order to meet the participation rate standard, one site operated the E&T program as a two-track system, with inexpensive job search/job placement services for a large number of job-ready participants and more intensive and expensive education and training services for a small proportion of the work registrant caseload identified as "at risk" because of multiple employment barriers.

JOBS Design and Implementation

All study sites had recently implemented employment and training services for AFDC recipients under the federal JOBS program that emphasized participation in education and targeted services to specific subgroups at risk of long-term dependency. The extent to which the design and implementation of the JOBS program influenced the Food Stamp E&T program varied.

In some sites, the two programs were perceived as serving populations with different service needs (i.e., Food Stamp work registrants were perceived as more job ready than AFDC recipients subject to JOBS participation). This perception, in combination with the disparate funding levels for the two programs, caused the Food Stamp E&T program to be operated as a separate, self-contained program in these sites.

In contrast, where the E&T program was interested in pursuing employability enhancement objectives, the JOBS program provided a model that was influential in shaping the service design of the E&T program. The primary feature of JOBS that was available for transfer to the E&T program was the emphasis on education for those with basic skills deficiencies. Thus, an increased emphasis on education was occurring in the E&T program in several sites. Administrators of one program, in particular, that had emphasized work experience as the most frequently used service component during the first several years of the E&T program said they were shifting the emphasis

from work experience to education as a result of the implementation of the JOBS program. Other E&T programs had added components or renamed components to mirror the design of the JOBS program.

The Existence of State or Local General Assistance Programs

The existence of state or local GA programs tended to give local sites an increased stake in the effectiveness of Food Stamp E&T services if the E&T program was used as the only work participation requirement for GA/Food Stamp recipients. Alternatively, if the state or locality operated a separate GA work program and exempted GA work program participants from the E&T program, this fact caused the site to be less interested in the design and implementation of Food Stamp E&T services.

In all three study sites that operated the Food Stamp E&T program as the only work program serving GA/Food Stamp recipients, states contributed substantial funds to the operating costs of E&T services. In addition, each of these sites selectively targeted GA recipients for participation in E&T services and/or tended to match GA recipients to more intensive services than other E&T participants received. Another site that operated a separate GA work program that required participation in unpaid work experience also operated a paid work experience component within the Food Stamp E&T program that was reserved for local GA recipients.

In contrast, a site that exempted GA work program participants from E&T participation as long as they were active in the GA work program designed and operated the Food Stamp E&T program as a minimal effort to meet the federal requirements without doing any more than necessary in the way of program design or implementation.

Additional Factors

Overall, the level of urbanization and the level of unemployment had relatively little influence on E&T design decisions. This was due, at least in part, to the fact that many E&T design decisions were made at the state

level rather than developed or adapted to fit specific local contexts. This state-level decision-making led to some inconsistencies in the logic of the service designs used in particular study sites. For example, in one small urban site with low unemployment, E&T participants were required to contact 150 employers over 15 days of job search, even though this policy resulted in the harassment of the limited number of employers in this area. In a rural site with high economic dislocation in textiles and manufacturing and high unemployment, job search was emphasized for most E&T participants despite the low probability of obtaining immediate employment and the need to upgrade skills for the jobs that were available in the local labor market.

Nevertheless, the level of urbanization appeared to have some effect on E&T design decisions, particularly in sites where local decision-makers had some influence on the organization and design of the Food Stamp E&T program. Among the study sites, the three with the best-developed coordination linkages for the delivery of education and vocational training services to E&T participants were all highly urbanized sites containing central cities. These sites took advantage of their particularly rich service environments, including the presence of educational institutions and other agencies that could provide education and vocational training services, to develop a wide variety of financial and nonfinancial service linkages for E&T clients. On the other hand, a number of other highly urbanized sites had E&T designs that emphasized immediate employment through participation in job search.

Although the fact of state versus county administration did not appear to be influential, the extent of local participation in E&T design decisions did appear to influence E&T designs. Sites with a strong local role in E&T design were more likely to develop individualized service plans for E&T participants, building on a variety of local community providers to offer services to meet varied client needs. In contrast, E&T service designs in sites where the states made most of the design and implementation decisions tended to prescribe a standardized service sequence or a more rigid and codified set of rules about how to match clients to services.

The perceived job readiness of Food Stamp E&T work registrants was also an influential factor in local E&T design decisions. As noted above, six of

the eight local study sites that emphasized immediate employment as the E&T goal perceived most of their E&T work registrants to be job ready. In contrast, only one of the six sites that emphasized employability development as the E&T goal perceived most of their E&T work registrants to be job ready.

Summary of Factors Associated with Different E&T Design Options

In summary, sites with E&T programs that emphasized the provision of education and vocational training services tended to:

- Have E&T participants with substantial barriers to employment.
- Have GA cash assistance programs for employable individuals with no separate GA work program.
- Make high state fiscal contributions to E&T operating costs.
- Spend slightly more per service placement.
- Retain strong welfare agency control of the content and management of E&T services by using a mixed organizational structure (administering the E&T program in-house but contracting with one or more agencies or organizations for service delivery).
- Use both E&T funds and strong nonfinancial coordination linkages to arrange for the delivery of education and vocational services to E&T participants.
- Use selective client targeting to reach certain subgroups within the nonexempt work registrant pool, but exempt low percentages of work registrants through categorical or individual exemptions.
- Consolidate E&T operations and services with the JOBS program for AFDC recipients.

In contrast, sites with E&T programs that emphasized immediate employment through participation in job search tended to:

- Offer no GA benefits to employable individuals.
- Make no or low state fiscal contributions to E&T operating costs.
- Have E&T participants who were perceived to be job ready.

- Exempt high percentages of work registrants through categorical and/or individual exemptions.
- Target the entire nonexempt work registrant pool for participation in E&T services.
- Operate E&T services in-house or contract the entire program to another agency or organization.

7 PROGRAM REPORTING AND ACCOUNTABILITY

In this chapter, we describe the data collection and reporting practices for the E&T program across the study sites and describe the implications of these practices for program accountability. Currently, states are required to submit quarterly E&T program reports and annual summaries to FNS on the number of work registrants and exempt work registrants, and the number of volunteers and mandatory participants who begin E&T components. In addition, states are required to report the number of work registrants sent a notice of adverse action (NOAA) or denied Food Stamp certification for failure to comply with E&T requirements. These data items are used to compute each state's performance level on the federal performance standard, which measures the number of placements into E&T service components and NOAAs as a percentage of mandatory nonexempt work registrants. A separate report on program expenditures must also be submitted quarterly and at the end of the year.

In the following sections of this chapter, we describe some of the variations in current data collection and reporting practices across the study sites, discuss the effect of the current participation rate performance standard on E&T program design and operations, and assess the capacity of the E&T program to implement outcome-based standards using the current data collection and reporting practices.

DATA COLLECTION PRACTICES AND MANAGEMENT INFORMATION SYSTEMS

The information systems operated by public assistance agencies are generally designed to serve important functions in the day-to-day operation of assistance programs--such as documenting eligibility and issuing benefits. To fulfill these functions, information systems must be able to summarize the status of active cases and provide on-line access to case workers for queries about or updates to current information about individual cases.

Generating summary statistics for all participants over an extended period to meet reporting requirements is a secondary consideration in the design of public assistance information systems. Consequently, statistics for federal reporting or any other program management purpose tend to be generated through manual computations or by means of special software designed to produce management reports.

One illustration of this problem occurred in a site that was well equipped to produce information on active cases by on-line queries to an E&T information system but could not use this system to summarize cumulative services or caseload characteristics over time (including cases both active and closed at the time of the query).

Although the client-level databases on which E&T management reports were based usually contained a number of different data elements, E&T report formats were usually set up to provide only the information required by the current federal reporting requirements. Information on the numbers of work registrants, exemptions, and NOAAs was obtained from Food Stamp eligibility/benefits information systems, while information on the number of E&T service placements by voluntary and mandatory participants was generally obtained from separate E&T information systems. Client-level data on client characteristics and client outcomes were usually present in one or both of these information systems. However, few resources were devoted to monitoring the quality of these additional data items unless they were required for some other program; furthermore, the capacity to summarize or generate reports using these additional data items was limited.

Ability to Integrate Data on E&T Participation and Eligibility/Benefits

Automated E&T information systems were in place in each of the study sites. However in 13 of the 15 sites, E&T information systems were separate from the Food Stamp eligibility/benefits management information systems (MIS). Because E&T staff were not eligibility/benefits workers in most sites, they had only limited access to the detailed case-level data maintained on these systems. In some sites, E&T workers could not access the

Food Stamp/cash assistance benefits MIS at all; in other sites, they could access it on a "read only" basis but could not enter data on E&T participation status.

The maintenance of E&T information systems and public assistance eligibility/benefits information systems as separate databases made it difficult for E&T staff to record participant outcomes or to track the effects of E&T participation on outcomes. E&T staff were generally dependent on eligibility/benefits staff to provide information on whether a Food Stamp case had been closed or whether an individual was exempted from further E&T participation. If a case was closed, E&T staff often received no information on whether the closure was due to participant employment, sanctioning, or some other reason.

One study site maintained a consolidated management information system that combined E&T participation data and Food Stamp/cash assistance eligibility/benefits data. In another site, the state had designed an automated database for the E&T program that had the capacity to link with the state's Food Stamp/cash assistance MIS to pick up additional client-level data. Another feature of this system included the capacity for compiling information on the percentage of clients who cured sanctions. This was the only state visited where an automated exchange could occur between the cash assistance/Food Stamp benefits MIS and the E&T information system. Another study state was designing a new E&T information system that would have the capacity to link with the eligibility/benefits MIS.

Local and State Management of E&T Data

Local Management of E&T Data

In 9 of the 15 study sites, counts of E&T service placements were compiled at the local site level, rather than at the state level. Five of the nine sites were locally administered. Local staff at these nine sites were responsible for preparing monthly reports of aggregate client activity for the state. These reports were submitted in hard-copy form and contained only the data elements required by federal reporting regulations.

Three of the sites responsible for data management at the local site level subcontracted the delivery of E&T services to another agency. In these sites, the contracted service provider was responsible for compiling data on E&T service placements and submitting it to the local Food Stamp agency for submission to the state. Local E&T staff monitored the data collection and reporting procedures used by these service providers.

In five of the nine sites where E&T data were managed at the local site level, additional data on client demographics and job placement outcomes were collected. However, staff at these sites reported that these data elements were not recorded consistently. Summary reports on client characteristics and outcomes were not generally prepared at these sites, since there was no software to produce summary statistics.

State Management of E&T Data

The remaining six sites compiled data for E&T quarterly and annual reports at the state level, using a statewide MIS into which staff in each local site entered client-level data. In these sites, it was more difficult to obtain summary statistics on E&T operations at the local site level. On the other hand, the statewide E&T MIS systems generally were more sophisticated and could generate a wider variety of aggregate statistical profiles on statewide E&T operations. For example, two of the study states were able to generate demographic profiles of the work registrant population.

One study state with a centralized state MIS used the record of supportive service expenditures as the sole mechanism for tracking entry into service components. In this state, each time a client entered, exited, or dropped out of a component, a supportive service eligibility form was completed by local Employment Service (ES) staff (the contracted E&T service provider) and sent to the state ES office for keypunching. State ES staff compile these data monthly for the state Food Stamp agency, which prepares the quarterly federal reports.

Two of the states with centralized state E&T information systems used their automated data processing capabilities to run data tape matches of JTPA participants against Food Stamp work registrants. Individuals identified through these matches were reported to FNS as E&T service placements.

A different reporting challenge was faced by two sites with statewide management information systems that consolidated the Food Stamp E&T program with the JOBS program for AFDC recipients and work programs for General Assistance recipients not on Food Stamps. In these sites, most program management reports included data on all participants, not just Food Stamp E&T participants. Consequently, it was difficult to retrieve information only on E&T participants for the required reports to the Food and Nutrition Service. One of these states had to request that a program be written specifically to produce the information for E&T reporting requirements. The other state was able to produce data on E&T active cases with ease, but the cumulative data required for federal reporting had to be produced manually by state staff

First, the performance standard created an incentive for local programs to count service placements, even if it was not clear whether participants received substantial services beyond initial enrollment in the service component. As described in Chapter 5, it was not always possible for local E&T sites to establish whether a participant completed a component when services were provided through a nonfinancial linkage to an outside service provider such as JTPA. This issue was not confined to placements with outside providers. Several sites enrolled participants in job search during the initial orientation session by having them document employer contacts they had already made before the session. Although this increased the reported number of service placements, it was not clear that the participant ever continued with job search beyond attending the first orientation session. Thus, the participation rate standard caused some E&T programs to emphasize entry into services over continuation and completion of services.

Second, the performance standard created an incentive for local programs to multiply the number of different service components reported, even when an integrated set of activities was involved. For example, one site counted a 2-day job search training session followed by a required job search as two different service components. Another site had service providers that delivered intensive services report as many as three or four service components for each participant, including, for example, preemployment training, education, vocational training, and job placement assistance.

Another feature of the participation rate performance standard that influenced state and local E&T designs and operating procedures was that it gave states as much credit for notices of adverse action as for service placements. Thus, two study states with comparable levels of service placements (as a percentage of mandatory nonexempt work registrants) varied markedly in their performance on the participation rate standard because one issued a much higher proportion of NOAAs. Although we saw no evidence in the study sites that E&T staff were choosing to emphasize NOAAs over the delivery of services, E&T staff in sites with a high rate of noncompliance complained that tracking and reporting noncompliance consumed a high proportion of their time.

CAPACITY TO IMPLEMENT OUTCOME-BASED STANDARDS

During FY 91, FNS published several alternative proposals for the implementation of new E&T performance standards based on client outcomes. Implementation of outcome-based standards was delayed, however, until one year after (1995-96) the publication of final outcome-based performance standards by the Department of Health and Human Services so that the two systems can be coordinated. Outcome-based performance standards will require a significantly expanded data collection and reporting capacity for the E&T program. Three major changes in the E&T data collection and reporting practices will be required to transition to outcome-based standards:

- (1) In contrast to the current federal reporting requirements, which are based on the number of entries into a service component, the implementation of outcome-based performance standards would require documentation of participant outcomes (e.g., employment and Food Stamp benefits status) at the completion of program participation and/or at a specified time after completion.
- (2) The implementation of outcome-based standards would require the ability to maintain an unduplicated count of participants, to track participant progress through one or several service components until the E&T case was closed, and to report on the outcome achieved for each E&T participant, rather than the aggregate number of service placements as at present.
- (3) To adjust reported state-level performance outcomes for the characteristics of the participants and local labor markets, client demographic data and local site identifiers would have to be collected on a consistent basis and included in automated client-level databases for aggregation at the state level.

Although a decision was made to delay implementation of outcome-based performance standards for the E&T program until after the design of performance standards for the JOBS program for AFDC recipients, administrators at the state and local site levels are beginning to think about how to collect and manipulate the data that would be required for outcome-based standards.

During FY 91, only one study state collected and had the capacity to compile summary statistics on entered employment rates and wages at placement for E&T participants. Another state that used the JTPA system as its major

service provider also had that capacity for the majority of its counties. Five additional states collected information on job placement outcomes at the client level but did not have the capacity to compile data across the entire E&T caseload. These states varied in the timing of collection of employment data, ranging from case closure to several months later.

Only two states collected and compiled demographic information on the mandatory work registrant population. Other sites collected some demographic information at the client level, but did not have the capacity to summarize these data for participants across the program. Without the capacity to record and manipulate data on client characteristics, it will not be possible to adjust performance standards for sites according to local variations in the client population. Sites that were compiling program data at the state level had a limited capacity to summarize E&T outcomes by local site. This limitation would also affect their capacity to adjust performance standards on the basis of the local labor market/public assistance context.

Development of the capacity to collect data necessary for the implementation of outcome-based performance standards would require a significant infusion of resources and staff time in most of the study sites. At least two sites reported that a transition to outcome-based performance standards would require a major overhaul of their management information systems. Staff in other sites expressed concern over increasing the resources devoted to tracking participants beyond E&T case closure without the provision of additional funding. In one site, staff commented that the transient nature of the Food Stamp population would make client follow-up contacts beyond service participation all but impossible.

SUMMARY

The information systems used to maintain data on E&T work registrants and participants were developed to serve important functions in the day-to-day operation of public assistance programs. The ability to generate summary statistics was a secondary consideration. Consequently, management report

formats were usually set up to provide only the information called for by the current federal reporting requirements. Additional data items on client characteristics and outcomes were sometimes present in client-level databases, but the capacity to summarize or generate reports using these data items was limited.

Automated E&T information systems were in place in each study site. In most sites, they were separate from the eligibility/benefits management information systems. This made it more difficult for E&T staff to track client outcomes or the effects of E&T participation on client outcomes.

In nine sites, E&T data were managed at the local site level and reported to the state in hard-copy summaries consisting of aggregate-level data. In the remaining six sites, E&T data were maintained in statewide client-level databases. States with consolidated Food Stamp E&T and JOBS programs sometimes had difficulty producing separate reports on the services received by Food Stamp E&T participants.

The participation rate performance standard was influential in E&T program design and implementation in most study sites. Influences included incentives to increase the emphasis on service entry rather than service completion, multiply the number of service components reported, and increase the number of NOAAs issued.

Proposed outcome-based performance standards would require documentation of client outcomes, the ability to maintain an unduplicated count of participation, and the ability to adjust for client characteristics and local labor markets. Relatively few states currently have the capacity to collect, compile, and report the required data items. Development of the capacity to collect and analyze the data necessary for outcome-based standards would require a significant infusion of resources and staff time in most sites.

8 CONCLUSIONS AND RECOMMENDATIONS

CURRENT FEATURES OF THE E&T PROGRAM

The Food Stamp Employment and Training Program is at an important crossroads. From FY 87 through FY 91, several factors--including limited program funds and the federal 50% participation rate performance standard--influenced state and local policymakers in most sites to design the E&T program as a sequence of relatively low-cost services focused on immediate employment for job-ready clients.

During FY 91, when this study was conducted, E&T programs tended to place most participants in self-directed job search or brief job search training workshops followed by job search. Programs usually targeted all mandatory nonexempt work registrants for participation in a standardized sequence of services, rather than targeting specific subgroups within the work registrant pool or individually matching clients to services based on an assessment of client experience, skills, or aptitudes.

Furthermore, job search components were usually oriented to monitoring procedural compliance with a specified number of required employer contacts, rather than helping clients to conduct effective job searches. Although most sites had developed nonfinancial referral linkages with education and vocational training providers, few sites used these linkages effectively or emphasized the delivery of more intensive services to E&T participants. Furthermore, few sites consolidated E&T services with JOBS services for AFDC clients because of the disparity in funding levels for these two programs and the perception that the clients of the two programs had different service needs.

Of the 15 sites included in this study, only two-fifths oriented their E&T programs to the needs of individuals with employment barriers, and only

one-fifth emphasized the delivery of education and/or vocational training services to a significant number of E&T participants. In the sites that did offer more substantial E&T services, states committed substantial funds to supplement federal E&T funds, nonfinancial coordination linkages were particularly effective, and E&T services were consolidated with the services provided to AFDC clients under the JOBS program.

THE CHANGING POLICY CONTEXT

In the past, federal E&T policies have tended to encourage the development of broad-based E&T programs that reach a high percentage of mandatory work registrants, through the 50% participation rate performance standard and federal review and approval of state E&T plans. However, two recent events have provided the impetus for a reexamination and alteration of federal policy priorities for the E&T program.

First, in 1990, a national study was released on the impact of E&T participation on participants' employment outcomes. This study, performed by Abt Associates, found that individuals who participated in E&T programs during FY 88 failed to achieve any statistically significant improvements in employment outcomes compared with what they would have achieved without program participation. Second, the Department of Agriculture has been proceeding with plans for developing congressionally mandated outcome-based performance standards for the E&T Program to replace participation rate performance standards.

These developments have resulted in several recent changes in the federal legislative and regulatory context for the E&T Program. These changes (1) emphasize the federal interest in encouraging states to serve individuals with greater barriers to employment and (2) substantially increase the flexibility available to states to design E&T services that target a limited population with more intensive services. Specific changes include:

- The statutory reduction in the federal participation rate performance standard from 50% to 10% of all mandatory nonexempt work registrants starting in FY 92.
- Freezing the allocation of incentive funds (based on the number of people placed into E&T components) at the FY 93 level until outcome-based standards are implemented to reduce the financial disincentives to states to implement more selective client targeting policies.
- A decision to coordinate development and implementation of outcome-based performance standards for the E&T program and the JOBS program.
- A demonstration scheduled to begin in FY 1993 of E&T/JOBS conformity in up to 60 local project areas to improve cooperation between the two programs and enhance the services provided to E&T participants.

Thus, without the pressures of having to meet the 50% participation rate standard, states now have an increased range of options in developing E&T program designs. They also have an incentive to provide E&T services that promote employment outcomes for program participants in preparation for the implementation of outcome-based performance standards. Finally, states are being encouraged to follow the lead of the JOBS program in designing services that address the needs of clients with employability barriers as well as helping job-ready clients to find appropriate employment.

BUILDING ON CURRENT PRACTICES

In most of the study sites, the development of E&T services that addressed participant barriers to employment was impeded by limited E&T funding. Even more importantly, the provision of intensive E&T services was impeded by a perspective that viewed E&T participation as a procedural requirement for receiving Food Stamp benefits rather than as a way to provide meaningful services to enhance employment outcomes. However, four of the study sites had a clear view of the E&T program as a means to provide meaningful services to participants. This perspective caused these sites to develop E&T services that were distinctly different from those of the other study sites.

First, in the intake and assignment of work registrants to services, two of these sites used formal assessments of all clients, and all four developed individualized service plans rather than assigning all participants to the same sequence of services. In addition, two of these sites used selective client targeting within the nonexempt work registrant pool rather than requiring all work registrants to participate in E&T services.

Second, in the design and delivery of job search and job search training components, each of these sites demonstrated one or more distinctive design elements, including:

- Matching clients to job search and job search training services that are appropriate to their individual circumstances--that is, assigning job-ready clients to less intensive services, while addressing the employability barriers of other clients through more intensive preemployment workshops.
- Providing substantial guidance during the job search period to ensure that participants generated appropriate job leads in their areas of interest and were as well prepared as possible for job interviews.
- Using job search training to reinforce effective individual job search efforts and vice versa, with instructor feedback and peer support and encouragement throughout the job search process.
- Providing ongoing secretarial and telephone support during job search, in addition to periodic feedback from a vocational counselor.

Third, in the provision of education and vocational training services, these sites emphasized the delivery of intensive services to a substantial proportion of all E&T participants by maintaining detailed information about available community resources, developing strong nonfinancial referral arrangements with these providers, encouraging or requiring participation in education or training services for clients with serious employment barriers, and providing case management throughout participation in these services. Two sites also contracted for the provision of education or training services tailored to the needs of E&T clients, using E&T program funds.

RECOMMENDATIONS FOR STRENGTHENING EMPLOYABILITY DEVELOPMENT GOALS

The recent national research findings that the Food Stamp E&T program did not achieve positive net impact on employment and earnings for program participants (Abt Associates, Inc., 1990) provide a compelling argument for dramatic changes in state and local Food Stamp E&T designs. However, the present study has revealed two major impediments to reorienting E&T resources: limited program funding and a widespread view of E&T participation as a procedural requirement rather than as an opportunity to receive meaningful services.

While the recent changes in the Food Stamp E&T policy context have provided individual states with increased flexibility in designing and operating their E&T programs, strong national leadership will be necessary to provide a catalyst for changing the orientation of the Food Stamp E&T program on a nationwide basis. Federal leadership could take a variety of forms, including:

- Increasing the funding level for the Food Stamp E&T program as a separate and distinct program (perhaps including financial incentive awards for those states that provided more intensive services to individuals with substantial employment barriers).
- Disseminating information about the different E&T program designs currently in use, particularly those designs that offer more intensive services to individuals with significant barriers to employment.
- Supporting national efforts to improve the cost-effectiveness of national employment and training resources by consolidating and coordinating delivery of services now separately administered by a number of different programs, as envisioned by the Administration's proposal for Job Training 2000.

Meanwhile, a number of individual states and local Food Stamp project areas may be interested in taking advantage of the reduced participation rate performance standard to redesign E&T services. Given the constraint of limited program funding, state and local design options to improve the intensity of E&T services and increase the program emphasis on employability development include:

- Redesigning individual service components to provide meaningful services to E&T participants.
- Implementing selective client targeting, rather than universal participation requirements.
- Matching individual clients to appropriate services, including assigning individuals with employment barriers to more intensive services.
- Strengthening service consolidation and service coordination linkages to increase the intensity and range of services available.
- Enhancing data collection and accountability procedures to document the completion of planned services and the achievement of employment outcomes by E&T participants.

Redesigning Individual Service Components

Nearly half of the study sites emphasized independent job search as a stand-alone component for most E&T participants. In many of these sites, participants met with E&T staff briefly at the beginning and end of each month of required job search. The "service" provided by the E&T staff usually consisted of a brief review of documented employer contacts made during the month. In most sites, little or no instruction was provided on effective job search methods.

Several sites included in the study had more intensive job search or job search training designs. Some sites offered job search training through two or more different classes, with one oriented to the employability needs of relatively job-ready clients and one providing more intensive preemployment workshops for less job-ready clients. Other sites offered substantial counselor guidance during individual job search, or used job search and job search training in combination to reinforce effective job search efforts through the provision of frequent instructor or peer feedback and support.

We recommend that states and local program designers interested in revising their E&T programs offer participants more meaningful assistance in conducting effective job searches to the extent possible given funding

constraints. Not all E&T participants will need detailed instruction in job search methods. However, at a relatively low cost, even job-ready clients could be offered access to a review of effective job search techniques (e.g., through brief group sessions). Job clubs and peer support groups are other low-cost organizational structures that could be used to provide ongoing support during job search to individuals needing more intensive services. In addition, local E&T programs could refer individual clients to job search services available from the Employment Service, JTPA, and community-based agencies.

Implementing Selective Client Targeting

Only a few of the study sites implemented selective client targeting within the mandatory nonexempt work registrant pool. However, given the reduction in the federal participation rate performance standard for FY 92 and beyond, states now have an increased opportunity to target E&T participation selectively to particular groups. Within the study sample, three sites with selective targeting had statewide General Assistance programs and used selective targeting to encourage or require GA recipients to participate in one or more E&T service components. In addition, one site with selective targeting policies referred only new Food Stamp cases to the E&T program. Another site permitted E&T case workers to exercise discretion in requiring individuals in the mandatory nonexempt pool to participate, with the intent of targeting individuals more likely to benefit from services and those receiving GA grants. The third site with selective targeting recruited mandatory work registrants for E&T participation by inviting them to initiate requests for E&T services.

While not necessarily a desirable goal in itself, selective client targeting is a logical response to the funding constraints of the E&T program. Given funding limitations, selective client targeting enabled states and local program administrators to design a program that offered more intensive services to a smaller number of participants, rather than spreading the available funding thinly over as many participants as possible.

However, client targeting policies created new operational questions, including how to ensure equity and fairness in applying selective participation requirements, whether to target services to individuals who can benefit from the currently available services or to design more intensive services for individuals with the greatest barriers to employment, and whether selective participation requirements would seriously undermine the effect of a general work registration requirement.

Nevertheless, we recommend that states interested in redesigning their E&T programs consider selective client targeting as a strategy to direct E&T resources to those most able to benefit from E&T participation (e.g., individuals with identifiable barriers to employment, those who have not located employment after an initial job search or who have been receiving Food Stamps for at least six months, and those who are motivated to pursue education or vocational training). Meanwhile a separate set of services could be provided to more job-ready clients on a voluntary or mandatory basis, if funding permits.

Matching Individuals to Appropriate Services

E&T service designs exhibit substantial variation in the matching of individuals to appropriate services. Four of the sample sites developed individualized service plans for each E&T participant. At the other extreme, four used a standardized service or sequence of services (emphasizing individual job search) for all clients. The remaining eleven sites offered some alternatives to initial job search for clients with particular characteristics or preferences.

As state and local E&T programs diversify their service offerings, with some services designed for individuals with more serious employment barriers and other services designed to provide meaningful job search assistance to more job-ready clients, matching individuals to appropriate services will take on increased importance. Without diversified services, individual service planning is an empty exercise. However, considering that the E&T program has limited funding yet offers a range of service options, individual

service planning is necessary to conserve the most intensive services for individuals with the greatest employment barriers.

We recommend that states and local sites wishing to modify their E&T program designs develop an expanded range of E&T service options and match clients to services on the basis of their individual service needs. One way to accomplish this is to require all participants to conduct an initial job search and assign individuals to more intensive services if they fail to locate employment after the first month of job search. Another way to match individuals to appropriate services is to implement individual service planning procedures based on formal assessments of participant barriers to employment. A third approach uses informal assessments of participant needs and interests in making service assignments.

Strengthening Service Consolidation and Coordination Linkages to Expand the Range of E&T Services

Service Consolidation

Three of the study sites operated Food Stamp E&T programs as part of a consolidated program for AFDC/JOBS participants, General Assistance recipients, and Food Stamp E&T participants. Although the operation of consolidated programs did not result directly in the leveraging of other funds for services to E&T clients, it assisted these study states in building support among taxpayers and state legislators for substantial state fiscal contributions to the consolidated program. The consolidated programs tended to use these larger E&T program budgets in two ways: (1) to support the costs of individual service planning and case management, and (2) to purchase more intensive education and vocational training services for some E&T participants. In addition the consolidated programs also tended to be more active in developing and using nonfinancial referral linkages to provide education and vocational training services to a larger number of E&T participants.

services.

While formal coordination agreements existed in a number of study sites, E&T staff generally were not aware of the detailed design or availability of existing local education and vocational training programs. Service referrals were often very general--e.g. "referral to the JTPA system for education or vocational training"--rather than specifying a particular training topic, curriculum, or service provider. In some sites, E&T staff could respond to a client request for a particular provider or course but did not attempt to counsel E&T participants about the available education or vocational training options.

In contrast, E&T staff in five study sites were particularly well informed about available community resources and played an active role in referring E&T clients to specific providers for specific training programs. In these sites, nonfinancial coordination linkages were perhaps the most important factor permitting an expansion of the range and intensity of services available to E&T clients.

We recommend that other states and local programs follow this lead. To make education and vocational training services more fully integrated options within the E&T service system, we recommend that E&T staff:

- Become familiar with the range of programs and services available in the local community.

- Develop effective formal coordination agreements with providers to facilitate the referral and enrollment of E&T clients in their programs.

Enhancing Accountability Procedures

The current data collection and reporting practices in most of the study sites are oriented to producing counts of the number of service placements into E&T components, as required by current federal reporting regulations, rather than the achievement of participant outcomes. During FY 91, only one study state had the capacity to compile summary statistics on employment rates and wages at placement for E&T participants.

As state administrators and local site managers begin to expand the range and intensity of services provided to E&T participants, they will be increasingly interested in how outcomes vary for different types of participants receiving different services. Additional information about program outcomes will also be necessary to generate the data for outcome-based performance standards, currently planned for implementation in FY 94 or FY 95.

To prepare for outcome-based accountability systems and to provide information on the effectiveness of different services for E&T clients, we recommend that states and local sites begin to develop the capacity to document client progress and service outcomes. The first step in developing accountability systems that address client outcomes is to begin to expand client-level records to track client progress through services provided in-house and by outside service providers, as well as client status at the time of termination from the E&T service system. The next step, which would require additional resources and more complex data collection procedures, would be the collection of information about client outcomes at the end of (or during) a follow-up period. These data will provide the basis for individual case management and state and local oversight of program operations, as well as the framework for subsequent implementation of outcome-based performance standards.